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ENVIRONMENTAL PROTECTION AGENCY

TECHNICAL ENFORCEMENT SUPPORT AT HAZARDOUS WASTE SITES

TES IV CONTRACT NO. 68-01-7351 EPA WORK ASSIGNMENT NO. R07018

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION AT
STEELCOTE MANUFACTURING COMPANY FACILITY
MOD006275036

JACOBS ENGINEERING GROUP INC. JACOBS WORK ASSIGNMENT NO. 05C01700

JUNE 30, 1989

TABLE OF CONTENTS

SECTION	PAGE
Abstract	1
Background	1
Nature and History of Operation	1
Investigation	2
Record Review	2
Site Inspection	2
Issues	3
Other Issues	4
Listing of Potential Violations	4

ATTACHMENTS

- 1. Steelcote Manufacturing Company Facility Records
- 2. Steelcote Manufacturing Company Photographs
- 3. Land Disposal Restrictions Checklist
- 4. Notice of Violation, Confidential Business Information Form and Receipt of Documents

RCRA LAND DISPOSAL RESTRICTIONS REPORT

PREPARED FOR

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VII WASTE MANAGEMENT DIVISION COMPLIANCE RESPONSE BRANCH

Facility:

Steelcote Manufacturing Company

3418 Gratoit Street

St. Louis, Missouri, 63103

EPA ID Number:

MOD 006275036

Date of Inspection:

June 9, 1989

Jacobs Representatives:

Greg C. Uetrecht, Environmental Engineer

Laurie M. Smith, Industrial Hygienist

Facility Representative:

James S. Moore, Plant Manager

Report Prepared By:

Greg C. Uetrecht

Report Date:

June 30, 1989

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION AT STEELCOTE MANUFACTURING COMPANY FACILITY ST. LOUIS, MISSOURI REGION VII WORK ASSIGNMENT NO. R07018

ABSTRACT

EPA Hazardous	Hazardous	Disposal	Disposal
Waste Code	Waste Stream	<u>Facility</u>	Method
F003/F005	Xylene,	American	Treatment/
	Toulene,	Resource	Incineration
	Methyl ethyl ketone	Recovery	
		Corp.,	
	still bottoms	Memphis, TN	
F003/F005	Xylene,	On-site	Reclamation
	Toulene,	distillation	
	Methyl ethyl ketone		

Steelcote was cited for the following violations:

40 CFR 268.7(a)(1) - Each manifest did not include notifications of the appropriate treatment standards.

40 CFR 268 (a)(1) and (2) - Drums are unmarked and not labelled for F003 and F005.

BACKGROUND

Nature and History of Operation

Steelcote Manufacturing Company has been located at 3418 Gratoit Street in St. Louis, Missouri for over eighty years. Steelcote first began its business in formulating specialty coatings and trade-sale paints for the house paint market.

Currently, Steelcote produces industrial and architectural coatings for retail sales. The work force at Steelcote consists of fourteen people. At most, four people may be involved with the management of handling the hazardous wastes generated on-site. Steelcote's plant manager oversees this task.

Mr. Moore stated during the Land Disposal Restrictions (LDR) inspection of June 9, 1989 that Steelcote generates most of its hazardous wastes during clean ups. (Refer to photographs No. 1 and 2)

Steelcote is a full-quantity generator of hazardous wastes. Wastes are F003 and F005, based on an analyses of the reclaimed solvents (Attachment 1). No analyses of the spent solvents or still bottom wastes were available at the time of the LDR inspection. Mr. Moore stated that a waste analysis was currently being prepared for the F003 and F005 still bottom wastes by American Resource Recovery Corp. in Memphis, TN. Steelcote had recently contracted with American Resource Recovery to treat the still bottom wastes. To date, all still bottoms had been sent to Earth Industrial Waste Management Inc.

All the spent solvents used in cleaning the ball mills, roller mills, mix tanks, wash drums and paint valves are placed in 55-gallon drums. These drums are taken to the solvent distillation unit

(Photographs 5,6,7 and 8) in another area of the Steelcote. The distillation unit is approximately one year old. The F-solvent wastes in the drums are pumped into the solvent distillation unit. The recycled solvent is collected from a condenser pump in 55-gallon drums. An analysis of the recycled solvent is found in Attachment 1. The solvent distillation unit is cleaned out once a week. The F-solvent still bottoms are stored in drums awaiting off site shipment up to 150 days, according to Mr. Moore. He said that Steelcote had a verbal agreement with the State of Missouri that they could store hazardous wastes up to 150 days as long as a still was installed on site. Documentation of this agreement was not available to the inspectors.

Mr. Moore stated that another very small waste stream generated by Steelcote is returned products and aged inventory that could not be used (Photographs No. 14 and 15). This waste stream is placed into 55-gallon drums and stored for off site treatment. During the LDR inspection, the length of storage of this returned product was unknown to Mr. Moore. He stated that he keeps a notebook of accumulation dates; however, this notebook was not available to the LDR inspectors upon request. This waste stream, according to Mr. Moore, is mixed with the still bottoms. In the past, three (3) 55 gallon drums of F003 waste were rejected by the treatment facility because they also contained polychlorinated biphenyls (PCBs). These three (3) drums were still being stored in the area of the distillation unit at the time of the LDR inspection (Photograph 13, and Issue Section).

INVESTIGATION

Record Review

Manifests/ LDR Notifications/Waste Analyses

Steelcote's most recent hazardous waste shipment was sent to Earth Industrial Waste Management, Inc. in Millington, TN on April 3, 1989. Eight (8) drums of waste F003 and F005 were shipped. Steelcote did not attach a notification indicating that the F003 and F005 wastes were exceeding the treatment standards for methyl ethyl ketone (MEK), methyl isobutyl ketone (MIK), toluene, and xylene. Steelcote also sent F003 and F005 wastes to American Resource Recovery Corp. on October 6, 1988 without notification of F-solvent treatment standards. Likewise, on September 20, 1988, Steelcote shipped F003 waste to Reclaimed Energy Company, Inc. with an F-solvent notification form. However, the treatment standards were not listed for Steelcote's F003 waste. This manifest and waste was rejected by Reclaimed Energy Company, Inc. and the shipment was returned to Steelcote. This waste, noted on the manifest, was still stored at the facility during the LDR inspection. On September 15, 1988, Steelcote shipped hazardous wastes called "D001", to Rineco Chemical Industries. Mr. Moore could not answer why the waste was identified as D001, and he stated that all Steelcote's hazardous wastes were F003 and F005.

SITE INSPECTION

At 8:36 am, on June 9, 1989, the LDR inspectors met Mr. James S. Moore, the Plant Manager of Steelcote. A brief meeting provided Mr. Moore with information and background on the purpose of the LDR inspection. Mr. Moore stated that all the waste streams came from clean up except a small percent consisting of old stock and customer returns.

At 8:55 am, a plant tour was conducted starting on the second floor of Steelcote. Photographs were taken to show areas of concern (Attachment No. 2). The F003 and F005 wastes were generated in cleaning drums, steel balls from the mills, paint mixing tanks, and roller mills. This waste stream was placed in 55-gallon drums and sent over to the solvent distillation unit area.

At 9:12 am, Mr. Moore led the LDR inspectors to his office to review manifests and waste analyses. Mr. Moore was requested to provide all manifests from July 1988 to the present. Four treatment facilities have received F003, F005 and D001 wastes from Steelcote during this period. Some of the manifests had no F-solvent notifications, or the notifications were incomplete.

Mr. Moore stated that a local laboratory had completed the analysis of the hazardous waste generated at Steelcote; however, this analysis was found to be of Steelcote's reclaimed solvent, not the F003 and F005 generated wastes or still bottom wastes (Attachment No. 1).

The plant tour continued at 9:32 am in the solvent distillation unit area. Thirty-five (35) 55-gallon drums were noted in this area. Mr. Moore said that five (5) drums were full of waste solvents awaiting reclamation in the still; however, empty drums were not segregated from full ones. None of the drums were labelled appropriately as a hazardous waste (Photographs No. 6 and 7).

The solvent distillation unit was Progressive Recovery Inc. Model SC. The typical distillation time according to Mr. Moore was about four (4) hours. A load of 130 gallons of F003 and F005 clean up waste could be sent through the still in one day. The still pulls off volatile constituents at temperatures up to 320 degrees Fahrenheit. The recycled solvent is drummed for use in Steelcote's plant. The still bottoms are collected and shipped out in full 55-gallon drums. Mr. Moore stated that storage is about 130 days. It was unclear on how long the F003 and the F005 clean up wastes were stored before being distilled. Seventeen (17) drums were waiting near the still to be recycled (Photographs No. 8). These drums were not labelled. In this area also were three (3) drums of still bottoms and solvent waste mixed with PCBs. Mr. Moore stated that the PCBs came from old stock which contained Aroclors 1544 and 1240, although these are not the correct numbers for PCB Aroclors. The concentration of PCBs ranged from 7 to 26 mg/L.

In the Steelcote basement, the RCRA storage area contained twenty-six (26) 55-gallon drums, all of which were unlabelled. Mr. Moore stated that the drums contained aged inventory. One drum was noted to be leaking and the release was outside of the storage area. Mr. Moore was asked when the labels were placed on Steelcote's drums. He stated that this occurred when the drums were full; however, no labels were noted. The plant tour was completed at 10:00am.

The inspectors began reviewing Form B of the checklist-Treatment, Storage and Disposal with Mr. Moore, who then requested that he be allowed to consult with legal counsel prior to completion of the checklist at a later date. Mr. Moore stated that the facility will pay any monetary fees to avoid obtaining a permit to become a treatment, storage, and disposal facility. The inspectors then completed the remainder of the checklist for generator status only. Steelcote was issued a Notice of Violation prior to conclusion of the inspection.

ISSUES

1. Mr. Moore stated that to his knowledge Steelcote had an agreement with the state of Missouri Department of Natural Resources which allowed the storage of the F003 and F005 wastes up to 150 days if a still was installed. Also, Mr. Moore stated that accumulation dates for this waste were kept in a notebook. No documentation on either of these statements was available at the time of the LDR inspection. It remains unclear, without this documentation, the length of time the F003 and F005 clean up wastes were stored before being recycled.

From the manifest document No.00018, it was clear that a drum of F003/F005 waste with an accumulation date of January 1, 1989 was not shipped off site until April 3, 1989. This was greater than the 90 day storage allowed. Also, in manifest document No. 00014, the F003/PCB wastes were returned to Steelcote approximately during the first week of October 1988; however, these drums were still being stored on site at the time of the LDR inspection. It therefore

appears that Steelcote is in violation of the generator requirements for storage and are subject to 40 CFR 265, 244 and 270..

Steelcote relies solely on the treatment facilities for their analyses of Steelcote's F-solvent wastes. Mr. Moore did not have these analyses for review at the time of the LDR inspection. Steelcote believes that they are correctly determining the appropriate treatability group for the F-solvent wastes; however, during the LDR inspection there was no verification of this statement. This was also true for verification of the California List Wastes.

OTHER ISSUES

General housekeeping is a major problem at Steelcote. Many empty product and hazardous waste drums were stored together. Most of the drums were without labels. Stains were noticed on the floor. A drum was noted leaking in the basement RCRA storage area.

Steelcote had three underground storage tanks. Two tanks had been removed. Xylene (product) and fuel oil were being stored according to Mr. Moore in the same area as the cleanup, waste solvent outside of the still. None of the drums were labelled.

LISTING OF POTENTIAL VIOLATIONS

At the end of the LDR inspection, the following violations were cited specific to the LDR requirements.

40 CFR 268.7 (a)(1)

Steelcote, as a generator of F003 and F005 wastes, failed to notify the treatment facility in writing of the appropriate treatment standards set forth in 40 CFR 261 for each shipment of F-solvent wastes sent.

40 CFR 268.50 (a)(1) and (2)

o Steelcote had been storing F-solvent wastes for greater than 90 days without each container (drum) clearly marked to identify its contents and date each period of accumulation began.

Upon completion of this report, the following potential violations were noted:

40 CFR 268.7 (a)(4)

Steelcote is using knowledge of reclaimed solvent composition solely for making a determination of the appropriate treatment standards and classifications of the F-solvent wastes. The analysis which Steelcote presented to the inspectors as applying to the spent solvents and still bottoms was applicable only to the reclaimed solvents (Attachment No. 1). Steelcote should run analyses on the spent solvent-clean up waste; spent solvent-still bottoms; and the aged inventory waste, all supporting data to make this determination must be maintained on-site in Steelcote's files. Steelcote does not appear at present to be adequately characterizing their waste streams.

40 CFR 262.34 (a)(2) and (3)

Steelcote failed to clearly mark the date when each period of accumulation began so that it was visible for inspection on each container. Also, while the waste is being accumulated on-site, each container must be clearly marked "Hazardous Waste".

40 CFR 262.34 (a)(4)

o Steelcote must comply with the requirements for owners and operators in Subparts C and D in 40 CFR Part 265 and with Section 265.16.

40 CFR 262.34 (b)

o Steelcote, as a generator which accumulates hazardous waste for more than 90 days, is an operator of a storage facility and is subject to the requirements of 40 CFR Parts 264 and 265, and the permit requirements of 40 CFR 270.

ATTACHMENTS

- 1. Steelcote Manufacturing Company Facility Records
- 2. Steelcote Manufacturing Company Photographs
- 3. Land Disposal Restrictions Checklist
- 4. Notice of Violation, Confidential Business Information Form and Receipt of Documents

ATTACHMENT 1 STEELCOTE MANUFACTURING COMPANY FACILITY RECORDS



STATE OF ARKANSAS Department of Pollution Control and Ecology P. O. Box 9583 Little Rock, Arkansas 72219 Telephone 501-562-7444

Telephone 501-562-7444 Form Approved. OMB No. 2050-0039. Expires 9-30-88 (Form designed for use on elite (12-pitch) typewriter.) Please print or type. 1. Generator's US EPA ID No. Information in the shaded areas is not required by Federal law. UNIFORM HAZARDOUS м р р р р в 2 7 5 р в в р р Ц В I WASTE MANIFEST A. State Manifest Document Number 3. Generator's Name and Mailing Address AR-280229 Steelcote Manufacturing Company B. State Generator's ID 3418 Gratiot St. Louis, MO 63103 MO. 4. Generator's Phone (314) 771-8053 5. Transporter 1 Company Name C. State Transporter's ID US EPA ID Number H281/PC966 D. Transporter's Phone Trans Truck E. State Transporter's 10 7. Transporter 2 Company Name F. Transporter's Phone G. State Facility's ID 9. Designated Facility Name and Site Address
Rineco Chemical Industries N/A 1007 Vulcan Road-Haskell H. Facility's Phone ARD981057870 Benton, AR 72015 501-778-9089 Unit Wt/Vol Total Quantity 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) I. Waste No. Paint D001 Waste KKXXXXX Related Material Flammable Liquid IVA 1263 SEP 2 9 1988 J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above if no alternate TSDF, return to generator James Moore (314) 771-8053 15. Special Handling Instructions and Additional Information GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Year James S. Moore 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Dollum BLAKE TOLLESON 101911 51818



STATE OF ARKANSAS **Department of Pollution Control and Ecology** P. O. Box 9583 Little Rock, Arkansas 72219



Telephone 501-562-7444 Form Approved. OMB No. 2050-0039. Expires 9-30-88 (Form designed for use on elite (12-pitch) typewriter.) Please print or type. Information in the shaded areas is not required by Federal law. UNIFORM HAZARDOUS **WASTE MANIFEST** A. State Manifest Pocument Number 3. Generator's Name and Mailing Address
Stocloote Hannfacturing Company 3418 Gratiot St. Louis, 19 63103 B. State Generator's ID 771~2053 4. Generator's Phone (C. State Transporter's ID R281/PC966 5. Transporter 1 Company Name Erans Truck D. Transporter's Phone (88) 398-6753 E. State Transporter's ID 7. Transporter 2 Company Name F. Transporter's Phone G. State Facility's ID US EPA ID Number 9. Designated Facility Name and Site Address Rineco Chemical Industries NIA H. Facility's Phone 1707 Sulcan Road-Noskett A & D 9 8 1 0 5 7 8 7 404...779.. 9680 Mar. M. 7243 13. Total Quantity 14. Unit 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) Wt/Vol Waste No. Type Faint D001 Whate KREMER Related Material Flammable Liquid b. C. ď. J. Additional Descriptions for Materials Listed Above K. Handling Codes for Wastes Listed Above ames Moore (314) 771-8053 if no alternate TSDF, return to generator 15. Special Handling Instructions and Additional Information GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford. Printed/Typed Name Signature James S. Hoore 17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Day Year Month 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year

2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62794-9276 (217) 782-6761 P.O. BOX 19276 IL532-0610

LPC 62 8/81

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INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT P.O. Box 7035 Indianapolis, IN 46207-7035

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B. Generator's Name and Mailing Address					State Manifest Doc		
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	St. Louis, MC	n 63103 🖑		` -	State Generator's II		<u> </u>
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5. Transporter 1 Company Name		Use EPA ID Number	•		State Transporter's	***	. <i>J</i> / 115
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7. Hansporter 2 Company Name	an Albania Ist	OSE EFA ID Hullipei		1	Transporter's Phone		
O Design and Facility Name and City Add	<u> </u>	Use EPA ID Number	· · ·	•	State Facility's ID		4.5
9. Designated Facility Name and Site Add	· · · ·	USE ETA ID MUITIDET			Clair racinty S ID		
Reclaimed Energy, Co.,	Inc.	introduction and the	PE 2:56"	1	Facilitada DCama		No. 19 Comment
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15. Special Handling Instructions and Addition		61 5					
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harmful. Prolonged co							
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 GENERATOR'S CERTIFICATION: I hereb proper shipping name and are classifie 	y declare that the contents	s of this consignment	are fully and	accura	tely described abo	ve by	wav
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determined to be economically practic	able and that I have selec	ted the practicable m	ethod of tre	atment.	storage or dispos	al currer	itly available to me
which minimizes the present and future effort to minimize my waste generation	and select the best waste		that/s avail	able to	me and that I can	afford.	
Printed/Typed Name		Signature	1 4	11.			Date Month Day Year
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17. Transporter 1 Acknowledgement of Recei	pt of Materials			•			
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18. Transporter 2 Acknowledgement of Recei	ot of Materials	- Jun	u Y	uzz	and a		1100100
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BEING OFF SPECIA	ICATION. GENE	RATOR NOTIFI	ED.				
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20. Facility Owner or Operator: Certification of	of receipt of hazardous materi	ials covered by this mar	ifest except	as noted	Item 19.		
Printed/Typed Name		Signature				, /	Month Day Year

EPA Form 8700-22 (Rev. 9-86)

DISTRIBUTION:

PAGE 1 (white) TSD MAIL TO GENERATOR

PAGE 5 (light blue) TSD COPY

sase spire indicated of the same merges per National Response Center at 800/424-8802 or 202/426-2675.

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In case of a spill call Indiana Office of Environmental Response at 317/243-5155 (day), or 317/633-0144 (night) and the National Response Center at 800/424-8802 or 202/426-2675.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT P.O. Box 7035 Indianapolis, IN 46207-7035

PLEASE PRINT OR TYPE (Form designed for use on		er.) F				39. Expires 9-30	
NIFORM HAZARDOUS 1. Generator's US EPA WASTE MANIFEST M.O.D.O.6.2	.7.50360°	Manifest Opcument No.	2. Page	1 Informa not req items D State la	tion in the uired by , F, H and w.	e shaded areas Federal law, t I are required	ut by
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Reclaimed Energy Co. Inc.	. etgjajazza sili hi	4- 4		gard Sang	_ `		1
1000 Western Ave.,	· •		H. Facilit	y's Phone			
Connersville, IN. 47331 [1.]	N.D.O.O.O.7.8	.0.4.0.1	1 317	-827-0	772		
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GENERATOR'S CERTIFICATION: I hereby declare that the contents proper shipping name and are classified, packed, marked, and lab						way	•
according to applicable International and national government reg	gulations.	У			ŗ	•	
If I am a large quantity generator, I certify that I have a program	n in place to reduce th	he volume an	nd toxicity o	f waste ger	erated to	the degree I h	ave
determined to be economically practicable and that I have select which minimizes the present and future threat to human health	and the emironment:	OR. if I am a	smail quan	tity generate	or. I have		
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In case of a spill call Indiana Office of Environmental Response at 317/243-5155 (day), or 317/633-0144 (night) and the National Response Cemer at 500/424-550 or 202/420-2675.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF SOLID AND HAZARDOUS WASTE MANAGEMENT P.O. Box 7035 Indianapolis, IN 46207-7035

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3.	Generator's Name and Mailing Address Steelcote Manuti	acturing			A. State Manifest [Document Nur	nber 	
	3418 Gratiot	***			IINA 0	2392	265	
	St. Louis, M.	63103			B. State Generator	's ID		
	Generator's Phone (314) 771-8053					0011		
5.		EPA ID Number	,	_	C. State Transport			
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9.		EPA ID Number			G. State Facility's	iD .		
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	naceful. Prolonged contact with skin ma				maring or	Authoro	alay be	
	If not deliverable, return to generator			# 1	OSG - Modella	1115		- 1
16	GENERATOR'S CERTIFICATION: I hereby declare that the contents of the							
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	according to applicable international and national government regulation				. 1 . 5	*		l
	If I am a large quantity generator, I certify that I have a program in getermined to be economically practicable and that I have selected to	place to reduce the the practicable met	e volume a hod of trea	and atme	toxicity of waste gent, storage, or dis	generated to posal currer	the degree	i have to me
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2	O. Facility Owner or Operator: Certification of receipt of hazardous materials of	overed by this manife	est except a	as no	oted Item 19.			
·	Printed/Typed Name S	Signature				./	Month Day	Year
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GENERATOR NOTIFICATION TO RECLAIMED ENERGY CO., INC. OF WASTES RESTRICTED FROM LAND DISPOSAL

This notification is submitted in accordance with the Land Disposal Restrictions, under 40 CFR 268.7(a)(1). Generators of EPA Hazardous Waste Numbers F001 to F005 and/or "California List" (see Footnote) constituents above their prohibition levels must provide the following information with each shipment delivered to Reclaimed Energy Co., Inc.

	Generator Name Steel Ote 11/6.
2.	Waste Name Waste Point Related Material
3.	EPA Hazardous Waste Number(s): F001, F002, F003, F004, F005 (Circle one or more)
4.	Corresponding Solvent Treatment Standard and/or California List Prohibition Levels (See below).

5. Manifest number of this shipment: _______

101

6. Waste analysis data (attach if different from Reclaimed Energy Co., Inc. analysis).

CORRESPONDING SOLVENT TREATMENT STANDARD & CALIFORNIA LIST PROHIBITION LEVELS

Instructions: For each constituent present in this waste or its extract, check the appropriate box in front of the treatment standard(s) or prohibition level(s) which apply.

Solvent Treatment Standards		(mg/liter) Spent solvent wastes	California List	Proi	nibition Level
•	(V)		Constituents	(V)	Concentration (mg/L)
Acetone		0.59	Cyanides		1,000
n-Butyl alcohol		5.0	Arsenic		500
Carbon disulfide		4.81	Cadmium		100
Carbon totrachloride		0.96	Chromium VI		500
Chlorobenzene		0.05	Lead		500
Cresols and cresylic acid		0.75	Mercury		20
Cyclohexanone		0.75	Nickel		134
1,2-Dichlorobenzene		0.125	Selenium		100
Ethyl acetate		0.75	Thallium		130
Ethyl benzene		0.053	Liquids withpH32.0		
Ethyl ether		0.75	Liquids with PCBs		50 թթա
Isobutanol		5.0	Wastes containing		1,000mg/kg
lle thano l		0.75 ·	HOCs *		
Methylene chloride		0.96	*Halogenated organ	10	
Methylene chloride (from the				IIC	
pharamaceutical industry)		0.96	compounds.		
Methyl ethyl ketone		0.75	(Example Chlo	rina	ited
lethyl isobutyl ketone		0.33	Florocarbons)	
Hitrobenzene		0.125			
Pyridine		0.33			
Tetrachloroethylene		0.05			
Toluene		0.33			
1,1,1-Trichloroethane		0.41			
1,1,2-Trichloroethane		0.96			

Footnote: The California List Constituent Prohibition levels apply nationally.

0.091

0.96

Trichloroethylene Trichlorofluromethane PARATE SHEET.

HIPMENTS.

FOR THE COM-

ETION OF THIS FORM BREONA

HIS DOCUMENT MUST BE USED

FOR ALL MISSOURI-DESTINED

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program
P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCE

HAZARDOUS WASTE MANIFEST

Form Approved, OMB No. 2050-0039, Expires 9-30-88 se print of type (Form designed for use on elite*(12-pitch) typewriter.) Information in the shaded areas 1. Generator's US EPA ID No. **UNIFORM HAZARDOUS** Manifes Document No. is required by State law **WASTE MANIFEST** 3. Generator's Name and Mailing Address Steelcote Manufacturing Co. St. Louis. No 63103 3418 Gratiot Street 6. US EPA ID Number Transporter's Phone 9. Designated Facility Name and Site Address 10. US EPA ID Number American Resource Recovery Corp 901 E. Bodley Memohis In 38106 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) 14. Unit Total Quantity Waste Paint Related Material Flammable Liquid UN1263 K. Handling Codes for Wastes Listed Above J. Additional Descriptions for Materials Listed Above If undeliverable return to generator. In event of spills, fire or other emergency it may be necessary to call N.R.C. 1-800-424-8802 RETURN 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity operator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a mall quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford. SEE INSTRUCTIONS SHOULD PART 1 & 17. Transporter 1 Acknowledgement of Receipt of Materials Date Day Printed/Typed Name Signature Month Printed/Typed Name Month Signature 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Day Printed/Typed Name Signature Month

9 ART COPY GENERATOR

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NSTRUCTIONS FOR THE COM-LETION OF THIS FORM ARE ON A SEPARATE SHEET.

THIS DOCUMENT MUST BE USED FOR ALL MISSOURI-DESTINED SHIPMENTS.

Form 8700-22 (Rev. 9-86) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 176 Jefferson City, Missouri 65102 314-751-3176

U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCE 314-634-2436

HAZARDOUS WASTE MANIFEST

Form Approved. OMB No. 2050-0039, Expires 9-30-88 ease print or type (Form designed for use on elite (12-pitch) typewriter.) Information in the shaded areas 1. Generator's US EPA ID No. Manifest 2. Page **UNIFORM HAZARDOUS** Document No. is required by State law. **WASTE MANIFEST** A. Missouri Manifest Document Number 3. Generator's Name and Mailing Address do Jeote Manufacturing Co. 1517 B. State Generator's ID - other St. Louis, No 63103 3419 Gratiot Street 001157 4. Generator's Phone (11/4) 771-01153 6. US EPA ID Number 5. Transporter 1 Company Name C. MO. Transporter's ID H-1645 D. Transporter's Phone 314-892-0907 112 All 8. US EPA ID Number 7. Transporter 2 Company Name E. MO. Transporter's ID F. Transporter's Phone 9. Designated Facility Name and Site Address 10. US EPA ID Number G. State Facility's ID American Resource Recovery Corp H. Facility's Phone 901 E. Bodley 901-774-2340 landing. In 39106 11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number, 1. Waste No. Total Quantity Wt/Vol Maste Paint Related Material Flammable Liquid UN1263 63 F003-F005 MO Othe K. Handling Codes for Wastes Listed Above J. Additional Descriptions for Materials Listed Above C. 15. Special Handling Instructions and Additional Information If undeliverable return to generator. In event of spills, fire or other emergency it may be necessary to call M.R.C. 1-809-7070-1 16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity operator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford Day 17. Transporter 1 Acknowledgement of Receipt of Materials Date Day Printed/Typed Name Signature Month Year Date 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Day Signature P717 H DALL+ N 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Day Printed/Typed Name Month

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MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality Waste Management Program P.O. Box 176 Jefferson City, Missouri 65102 314-751-3176

2. Page

EMERGENCY RESPONSE U.S. COAST GUARD 1-800-424-8802 CHEM TREC 1-800-424-9300 DEPT. OF NATURAL RESOURCES

HAZARDOUS WASTE MANIFEST

Please print or type (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039, Expires 9-30-91

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Printed/Typed Name 18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Signature Month Day Year Printed/Typed Name Signature Month Day Year Month Day Year Signature Printed/Typed Name Signature Signature Month Day Year Month Day Year Date Printed/Typed Name Signature Month Day Year	17. Transporter 1 Acknowledgement of Receipt of Materials			1			Date
Printed/Typed Name Signature Month Day Year 19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year	Printed/Typed Name	Signature	-> 10	i.i.			Month Day Year 10/4/0/3/89
19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date	18. Transporter 2 Acknowledgement of Receipt of Materials	74. 44°					Date
19. Discrepancy Indication Space 20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date	Printed/Typed Name	Signature					Month Day Year
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year	19. Discrepancy Indication Space						- Burney Company Compa
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year	,						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Date Printed/Typed Name Signature Month Day Year							
Printed/Typed Name Signature Month Day Year							
Printed/Typed Name Signature Month Day Year	20. Facility Owner or Operator: Certification of receipt of hazardous materials of	overed by this manifest except as noted	in Item 19.				
	¥		5-				Date
A Form 8700-22 (Rev. 9-88) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE		Signature					Month Day Year
A Form 8700-22 (Rev. 9-88) MDNR-HWG 10 PREVIOUS EDITIONS ARE OBSOLETE							

GENERATOR

SEE INSTRUCTIONS SHOULD WITHIN 35 DAYS.

LAND DISPOSAL RESTRICTION NOTIFICATION PAGE ONE - LISTED SPENT SOLVENTS (POO1-POO5)

		PTRI	RD B	PKNT	BOLVENTS (FD01-F0	D5)	
GENERATOR: Steelcote	>				MANIF	EST NO.	<u>m0</u>	
Page One Only Listed Spent Solvents	· (PO	01-F	005)		Ç	BIWM ode No.		(9)
[] Page Two Only "Califor Wastes"	rnia	Lis	t	Li Li	ne Item A(o ne Item B _ ne Item C _		1	3, F005
[] Both Page One and Page	e Tw	10	•	LI	ne Item D_			
This notification is subsecordance with regulation referenced waste(s) is treatment standard has been managed.	ons sub en m	pub ject arke	lishe to d be	ed th low	by EPA at e land disp to indica	40 Cosal bate how	PR 268 n and t	. The above the appropriat
•	IKEA	TMEN	T 8T/	ANDA	RD (MG/LITE Waste	K) **		Other
		Mani	fest		Wasters	Man	ifest -	Spent
		Line			W/Solvents		e Item	Solvents
Constituent						AIBI		
Acetone	` <u></u>	-	1	i	0.05			0.59
n-Butyl Alcohol	<u> </u>		-	<u> </u>	1 5.0			5.0
Carbon Disulfide	<u> </u>	<u> </u>	1	i ——	1.05	_ ;;	;	4.81
Carbon Tetrachloride	í	``	-	<u> </u>	0.05	_;;		0.96
Chlorobenzene ·	<u> </u>	` `	<u>`</u>	}	0.15		}	0.05
Cresols and Cresylic Acid	}	``		<u> </u>	2.82	_;;	— <u>;</u> —	0.75
Cyclohexanone	·	` <u>`</u>		`	0.125	— <u>; — </u>	;	0.75
1,2-Dichlorobenzene	` '	` <u>`</u>	-	`	0.65		—;—	0.125
Ethyl Acetate	` ——— (<u> </u>	_	`—	1 0.05		<u> </u>	0.75
Ethyl Benzene	<u> </u>	· ; ——	`—	;—-	0.05	—;—;		0.053
Ethyl Ether	i ———	`i	-	·	1 0.05			1 0.75
Isobutanol	i ——	-	-	1	5.0			5.0
Methanol	<u>'</u>	,	-	' ——— #	(0.25		;	0.75
		1	,	· —	0.20	_;;		. 0.96
Methylene Chloride	(-		-	1 :		,	!
(Pharmaceutical)	<u> </u>	1		(112.7		:	0.96
Methyl Ethyl Ketone	:	·	-		1 0.05	$Z_1 = i$		1 0.75
Methyl Isobutyl Ketone	·	· ;	:	<u> </u>	1 0.05	₹i i		0.33
Nitrobenzene	·	1	;	1	0.66			0.125
Pyridine	:	1	1	(1.12	- ;;	_,_	i 0.33
Tetrachloroethylene	!	1	1	·	1 0.079			· 0.05
Toluene		•	1	(1 1.12	$\leq -$		0.33
1.1.1-Trichloroethane		1	1	(1 1.05			1 0.41
1.1.2-Trichloroethane			4	1	1 1.05			0.96
Trichloroethylene			!	{	0.062			0.091
Trichlorofluromethane				,	1 0.05			0.96

The above constituent composition is based upon, [] an attached waste analysis or [X] my thorough knowledge of the waste.

I hereby certify that all information submitted in this and all associated documents is complete and accurate to the best of my knowledge and information.

× Jemus Moore (Mant Manager 4/3/89

Signed (Authorized Representative of Generator)

<u>Xvlene</u>

Title /

/Date

LAND DISPOSAL RESTRICTION MOTIFICATION PAGE TWO - "CALIFORNIA LIST" WASTES

This notification is submitted to Earth Industrial Waste Management, Inc. accordance with regulations published by EPA at 40 CFR 268. The wast referenced on page one of this document is subject to the land disposal ban at the appropriate treatment standard has been marked below to indicate how the waste must be managed.

TREATMENT STANDARD (MG/LITER) **

	Mani	ifest	Line I	tem	•
Constituents	i A	B	1 C	(D '	Concentration
Cyanide Liquid & Sludge	į .	1	1	<u> </u>	1,000.0
Arsenic	•		1		500.0
Cadmium		1	1	: :	100.0
Chromium	(i	1	1 3	500.0
Lead	ş .	,	1	, ,	500.0
Mercury	((1	4	20.0
Nickel	i	1	1	1	134.0
Selenium	1	•	1	-	100.0
Thallium	i	1	(1	130.0
Acid (Liquid)	<u> </u>	<u> </u>	1		рН < 2
Liquid HOC's	i	† 	(
Per App. III, Sec. 268	į i	i	i	i i	1,000.0
Liquid PCB	<u> </u>	†	7	1	50.0

** The above constituent composition is based upon, [] an attached waste analysis or [] my thorough knowledge of the waste

Restricted Waste Subject to Variance

[] The waste identified on page one of this document is subject to a case-by-case extension under 40 CFR 268.5. a no-migration petition under 40 CFR 268.6, a nationwide variance under Subpart C, or is soil or debris generated from a response action taken under CERCLA or corrective action taken under RCRA.

documents is complete and accurate to the best of my knowledge and information

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

PROPER D.O.T. SHIPPING NAME Waste Flammabl	UN UN NA#
GENERATOR INFORMATION: NAME Steelcote Manufactur ADDRESS 3418 Gratiot Stre	N.OS ing Company
ST. Louis	STATE MO ZIP 63103
EPA ID NO. MODO06725036	EPA WASTE NO. F003 / F005
ACCUMULATION START DATE January 1,1989	MANIFEST DOCUMENT NO. 18

HANDLE WITH CARE!

CONTAINS HAZARDOUS OR TOXIC WASTES

STYLE WM-6

Printed by LABELMASTER, Div. of AMERICAN LABELMARK CO.

CHICAGO, IL 60646

TO: Rich Ravens

FROM: Jim Moore

DATE: August 16, 1988

RE: Use of Reclaimed Solvent

The following is an analysis of our reclaimed solvent as done by Nicholas Litzsinger of Chemtech. We need to discuss how we can use this material. Let's get together at your convenience.

Reclaimed Solvent

	. /
MEK	19.3%
ISO Butanol	1.0%
N-Butanol	3.8%
MIBK	4.0%
Tolvene	5.9%
N-Butyl Acetate	3.0%
Aromatic 100	7.3%
Xylene	54.2%
Acetone	1.5%
	100.0%

Jim Moore

May in Sub

· COOK DOWN VERY LITTLE

- 420 ON ALL TIME

- TEMP & @ NIGHT NOT OFF

TO: RICH RAVENS
FROM: Jim MOORE
RE USE OF RECLAIMED SOLVENT

THE FOLLOWING IS AN ANALYSIS OF OUR RECLAIMED SOLVENT AS DONNE BY NICHOLAS LITZSINGER OF CHEMTECH. WE NEED TO DISCUSS HOW WE CAN USE THIS MATERIAL.

LET'SP GET TOGETHER AT YOUR CONVENIENCE,

RECLAIMED	SOLUGUT
HEK	19.3%
150 BUTANOL	1.0%
N-BUTANOL	3.8%
MIBK	4.0%
TOWENE	5.9%
N-BUTYL ACETATE	3.0%
AROMATIC 100	7.3%
XYLENE	54,2%
ACETONE	1.5%
	100.0%

JIM MOORE

Nick Chentech 9 Comports By Volume. F003 MEK 19.3 Iso Butarel 190 F003 N-Butanol 3.890, FDO3 MIBK 400 FOOS Toluene 5.90 FOOS N-Butyl Acetale 3% 54200 4003 1.5% 001 sitemora Xylene Acetore

MATERIAL SAFETY DATA SHEET 5-327

Dow Chemical U.S.A. Midland, MI 48674 Emergency Phone: 517-636-4400

MSD: 000010 Page: 1

PRODUCT NAME: ACETONE, SYNTHETIC

Effective Date: 05/30/85 Date Printed: 10/16/85 Product Code: 00259

1. INGREDIENTS:

Acetone

CAS# 000067-64-1 99.5%

Substances listed in the Ingredients Section are those identified as being present at a concentration of 1% or greater, or 0.1% if the substance is on the list of potential carcinogens cited in OSHA Hazard Communication Standard. Where proprietary ingredient shows, the identity of this substance may be made available as provided in 29 CFR 1910.1200(1).

2. PHYSICAL DATA:

BOILING POINT: 133F, 56C VAP PRESS: 181.7 mmHg @ 20C

VAP DENSITY: 2.00

SOL. IN WATER: Completely miscible.

SP. GRAVITY: 0.7880 @ 25/25C APPEARANCE: Colorless liquid.

ODOR: Sweetish.

3. FIRE AND EXPLOSION HAZARD DATA:

FLASH POINT: OF, -18c

METHOD USED: TCC

FLAMMABLE LIMITS

LFL: 2.6 % UFL: 12.8 %

EXTINGUISHING MEDIA: Alcohol foam, carbon dioxide, and dry chemical.

FIRE & EXPLOSION HAZARDS: Water can be used to cool fireexposed containers, to protect personnel and to disperse

(Continued on Page 2)

M'ATERIAL SAFETY DATA SHEET

Dow Chemical U.S.A. Midland, MI 48674 Emergency Phone: 517-636-4400

MSD: 000010 Page: 2

PRODUCT NAME: ACETONE, SYNTHETIC

Effective Date: 05/30/85 Date Printed: 10/16/85 Product Code: 00259

3. FIRE AND EXPLOSION HAZARD DATA: (CONTINUED)

vapors and spills. The autoignition temperature is 869F (465C).

FIRE-FIGHTING EQUIPMENT: Firemen should wear normal protective equipment and positive pressure self-contained breathing apparatus.

4. REACTIVITY DATA:

STABILITY: (CONDITIONS TO AVOID) Keep away from flames and spark-producing equipment.

INCOMPATIBILITY: (SPECIFIC MATERIALS TO AVOID) Nitric plus acetic acids and nitric plus sulfuric acids.

HAZARDOUS DECOMPOSITION PRODUCTS: Carbon dioxide and some carbon monoxide.

HAZARDOUS POLYMERIZATION: Will not occur.

5. ENVIRONMENTAL AND DISPOSAL INFORMATION:

ACTION TO TAKE FOR SPILLS/LEAKS: Small spill - allow to evaporate if it can be done safely. Otherwise soak up with absorbent material and scoop into drums. Large spill - dike and pump into drums using air-operated or other non-spark-producing pump. Prevent acetone from entering drains or sewers.

DISPOSAL METHOD: Burn in incinerator. Follow all local, state, and federal requirements for disposal.

6. # HEALTH HAZARD DATA:

EYE: May cause moderate eye irritation and moderate corneal injury. Vapors may irritate eyes.

SKIN CONTACT: Prolonged exposure not likely to cause significant

(Continued on Page 3)

MATERIAL SAFETY DATA SHEET

Dow Chemical U.S.A. Midland, MI 48674 Emergency Phone: 517-636-4400

MSD: 000010 Page: 3

PRODUCT NAME: ACETONE, SYNTHETIC

Effective Date: 05/30/85 Date Printed: 10/16/85 Product Code: 00259

6. HEALTH HAZARD DATA: (CONTINUED)

skin irritation. May cause drying or flaking of skin.

SKIN ABSORPTION: A single prolonged exposure is not likely to result in the material being absorbed through skin in harmful amounts. The LD50 for skin absorption in rabbits is 20,000 mg/kg.

INGESTION: Single dose oral toxicity is low. The oral LD50 for rats is >6000 mg/kg. No hazards anticipated from ingestion incidental to industrial exposure.

INHALATION: A single brief (minutes) inhalation exposure is not likely to cause adverse effects. Excessive exposure may cause irritation to upper respiratory tract. Excessive exposure may cause anesthetic or narcotic effect.

SYSTEMIC & OTHER EFFECTS: Repeated excessive exposures to high amounts may cause anesthetic or narcotic effect. Repeated excessive exposures to smaller amounts may cause irritation to eyes and respiratory tract. Did not cause cancer in long-term animal studies. Results of in vitro ("test tube") mutagenicity tests have been negative.

7. FIRST AID:

EYES: Irrigate with flowing water immediately and continuously for 15 minutes. Consult medical personnel.

SKIN: Wash off in flowing water or shower.

INGESTION: Induce vomiting if large amounts are ingested. Consult medical.

INHALATION: Remove to fresh air. If not breathing, give mouth-to-mouth resuscitation. If breathing is difficult, give oxygen. Call a physician.

NOTE TO PHYSICIAN: No specific antidote. Supportive care. Treatment based on judgment of the physician in response to

(Continued on Page 4)

MATERIAL SAFETY DATA SHEET

Dow Chemical U.S.A. Midland, MI 48674 Emergency Phone: 517-636-4400

MSD: 000010 Page: 4

PRODUCT NAME: ACETONE, SYNTHETIC

Effective Date: 05/30/85 Date Printed: 10/16/85 Product Code: 00259

7. FIRST AID: (CONTINUED)

reactions of the patient.

8. HANDLING PRECAUTIONS:

EXPOSURE GUIDELINE(S): ACGIH TLV is 750 ppm. OSHA PEL is 1000 ppm.

VENTILATION: Control airborne concentrations below the exposure guideline. Use only with adequate ventilation. Local exhaust ventilation may be necessary. Lethal concentrations may exist in areas with poor ventilation.

RESPIRATORY PROTECTION: Atmospheric levels should be maintained below the exposure guideline. When respiratory protection is required for certain operations, use an approved air-purifying respirator. For emergency and other conditions where the exposure guideline may be greatly exceeded, use an approved positive-pressure self-contained breathing apparatus.

SKIN PROTECTION: For brief contact, no precautions other than clean body-covering clothing should be needed. Use impervious gloves when prolonged or frequently repeated contact could occur.

EYE PROTECTION: Use chemical goggles. If vapor exposure causes eye irritation, use a full-face, supplied-air respirator.

9. ADDITIONAL INFORMATION:

SPECIAL PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE:
Practice reasonable care to avoid eye and skin contact and to
avoid breathing vapors. Use spark-resistant tools; no smoking
area for handling and storage. Refer to the acetone product
data bulletin.

MSDS STATUS: Revised 1.

(Continued on Page 5)

MATERIAL SAFETY DATA SHEET

Dow Chemical U.S.A. Midland, MI 48674 Emergency Phone: 517-636-4400

MSD: 000010

Page: 5

PRODUCT NAME: ACETONE, SYNTHETIC

Effective Date: 05/30/85 Date Printed: 10/16/85 Product Code: 00259

⁽R) Indicates a trademark of The Dow Chemical Company
The Information Herein Is Given In Good Faith, But No Warranty,
Expressed Or Implied, Is Made. Consult The Dow Chemical Company
For Further Information.

IVIA I ERIAL SAFETY DATA SHEET

METHYL ETHYL KETONE

5-321

MSDS No. HCROOO126 Rev. Date



ARCO CHEMICAL COMPANY DIVISION OF ATLANTIC RICHFIELD COMPANY 1500 MARKET STREET P.O. BOX 7258 PHILADELPHIA, PENNSYLVANIA 19101

0 20%

IMPORTANT: Read this MSDS before handling and disposing of this product and pass this information on to employees, customers, and users of this product

This product is covered by the OSHA Hezard Communication Rule and this

			19,5%	with the MSDS requirements of the rule
1.		General		
Trade Name	METHYL ETHYL KETONE		Here Hall	Telephone Numbers EMERGENCY 800/424-9300 CHEMTREC
Other Names	ETHYL METHYL KETONE, M 2-BUTANÖNE	JAN I 6	1939	215/353-8300 ARCO CHEM CUSTOMER SERVICE 800/321-7000 INFO ONLY
Chemical Family	ALIPHATIC KETONE	Li W	1	Materials Proper Shipping Name KETONE (MEK)
Generic Nam	16 N/P	,	DOT Hazard Cla FLAMMABLE LI	
CAS No.	SEE SECTION IX	Company ID No. E000012600	l	JN/NA ID No. UN 1183
11.	DANGER	Summary of H	azards	
······	PHYSICAL HAZARDS:	EXTREMELY FLAMMABLE L	IQUID	
	ACUTE HEALTH EFFECTS: (SHORT-TERM) CHRONIC HEALTH EFFECTS: (LONG-TERM)	MODERATELY TOXIC BY I MODERATE EYE IRRITAN MODERATELY TOXIC BY SMODERATE SKIN IRRITAN MODERATELY TOXIC BY I REPEATED BREATHING OF ETHYL KETONE MAY INCOMEUROTOXINS SUCH AS KETONE, IF EXPOSURES MEK HAS NOT BEEN SHOUBY ITSELF.	F SKIN ABSORPTION T INGESTION R SKIN CONTACT REASE THE POTEN HEXANE OR METH	OF METHYL NCY OF YL N-BUTYL SAME TIME.
111.		Fire and Expl	osion	
Flash Point	(Method) 20° F (TCC)	Autoignition Temperature 960° F	(Wethou)	Flammable Limits (% Vol. in Air) At Normal Atmospheric Temperature and Pressure Lower AP 2 Upper AP 12
Fire and Explosion Hazards	RELEASES FLAMMABLE VAPO WITH AIR AND EXPOSED TO IF CONFINED. FLAMMABLE DISTANCES ALONG GROUND	D IGNITION SOURCE, VAP VAPORS MAY BE HEAVIER	ORS CAN BURN I Than Air, May	N OPEN OR EXPLODE Travel Long
Extinguishin Media		ERSPRAY WATER DHOL TYPE FOAM	FOG	
	DO NOT ENTER FIRE AREA SITION PRODUCTS POSSIB			

Special

Firefighting

Procedures

451

AUTHORITIES IF LIQUID ENTERS SEWER/PUBLIC WATERS.

HEAT MAY BUILD PRESSURE/RUPTURE CLOSED CONTAINERS, SPREADING FIRE, INCREAS-

ING RISK OF BURNS/INJURIES. DO NOT USE SOLID WATER STREAM/MAY SPREAD FIRE.

USE WATER SPRAY/FOG FOR COOLING. AVOID FROTHING/STEAM EXPLOSION. NOTIFY

Health Hazards SEE SUPPLEMENT: BEGINNING ON PAGE

Acute Hazards	MODERATE HEALTH HAZARD - SEE BELOW FOR ROUTE-SPECIFIC DETAILS.					
ROUTE OF EXP	OSURE SIGNS AND SYMPTOMS	Primary Route(s)				
nhalation	OVEREXPOSURE MAY CAUSE COUGHING, SHORTNESS OF BREATH, DIZZINESS, INTOX- ICATION AND COLLAPSE.					
Eye Contact	MAY CAUSE MODERATE IRRITATION, INCLUDING BURNING SENSATION, TEARING, ct REDNESS OR SWELLING.					
Skin Absorption	EXPOSURE TO THIS MATERIAL CAN RESULT IN ABSORPTION THROUGH SKIN CAUSING HEALTH HAZARD.					
Skin MAY CAUSE DELAYED SKIN IRRITATION AND BLISTERING.						
SWALLOWING THIS MATERIAL MAY RESULT IN HEALTH HAZARD.						
THE PRIMARY CHRONIC EFFECT OF METHYL ETHYL KETONE IS ITS ABILITY TO Summary of Interact with Hexane and Similar Alkanes to Potentiate Their Neurotoxicity. Chronic Hazards Mek has not produced neurotoxicity by Itself when tested in Animals. See and Supplemental information on page 5 for further information on Chronic Special Health HAZARDS. Effects This material or its emissions may affect the Central Nervous System and/or AGGRAVATE PRE-EXISTING DISORDERS, PROLONGED OBSERVATION MAY BE INDICATED.						
V.	Protective Equipment and Other Control Measures SEE SU BEGINNIN	PPLEMENT G ON PAGE 8				
Respiratory	IF EXPOSURE CAN EXCEED THE PEL/TLV, USE ONLY NIOSH/MSHA APPROVED AIR-PURIFYING OR SUPPLIED AIR RESPIRATOR OPERATED IN A POSITIVE PRESSURE MODE.					
Еуе	EYE PROTECTION SUCH AS CHEMICAL SPLASH GOGGLES AND/OR FACE SHIELD MUST BE WORN WHEN POSSIBILITY EXISTS FOR EYE CONTACT DUE TO SPLASHING OR SPRAYING LIQUID, AIRBORNE PARTICLES, OR VAPOR. CONTACT LENSES SHOULD NOT BE WORN.					
Skin	WHEN SKIN CONTACT IS POSSIBLE, PROTECTIVE CLOTHING INCLUDING GLOVES, APRON, SLEEVES, BOOTS, HEAD AND FACE PROTECTION SHOULD BE WORN. THIS EQUIPMENT MUST BE CLEANED THOROUGHLY AFTER EACH USE.					
Engineering Controls	USE ONLY WHERE VENTILATION CAN CONTROL EXPOSURES TO WITHIN EXPOSURE STANDARD(S). SPECIAL ATTENTION SHOULD BE GIVEN TO LOW AREAS/PITS WHERE FLAMMABLE VAPORS CAN ACCUMULATE.					
	USE GOOD PERSONAL HYGIENE PRACTICES. WASH HANDS BEFORE EATING, DRINKING, SMOKING, OR USING TOILET FACILITIES. PROMPTLY REMOVE SOILED CLOTHING/WASH					
Other Hygienic and Work Practices	USE GOOD PERSONAL HYGIENE PRACTICES. WASH HANDS BEFORE EATING, DRINKING,					
and	USE GOOD PERSONAL HYGIENE PRACTICES. WASH HANDS BEFORE EATING, DRINKING, SMOKING, OR USING TOILET FACILITIES. PROMPTLY REMOVE SOILED CLOTHING/WASH					
and Work Practices	USE GOOD PERSONAL HYGIENE PRACTICES. WASH HANDS BEFORE EATING, DRINKING, SMOKING, OR USING TOILET FACILITIES. PROMPTLY REMOVE SOILED CLOTHING/WASH THOROUGHLY BEFORE REUSE. SHOWER AFTER WORK USING PLENTY OF SOAP AND WATER.	Time				

VIL	Emergency and First Aid				
Inhalation	IF OVERCOME BY EXPOSURE, REMOVE VICTIM TO FRESH AIR IMMEDIATELY. GIVE OXYGEN OR ARTIFICIAL RESPIRATION AS NEEDED. OBTAIN EMERGENCY MEDICAL ATTENTION. PROMPT ACTION IS ESSENTIAL.				
Eye Contact	IN CASE OF EYE CONTACT, IMMEDIATELY RINSE WITH CLEAN WATER FOR 20-30 MINUTES. RETRACT EYELIDS OFTEN. OBTAIN EMERGENCY MEDICAL ATTENTION.				
Skin Contact	IMMEDIATELY REMOVE CONTAMINATED CLOTHING. WASH SKIN THOROUGHLY WITH MILD SOAP/WATER. FLUSH W/LUKEWARM WATER FOR 15 MINUTES. IF STICKY, USE WATERLESS CLEANER FIRST. SEEK MEDICAL ATTENTION IF ILL EFFECT OR IRRITATION DEVELOPS.				
Ingestion	IF SWALLOWED, GIVE LUKEWARM WATER (PINT) IF VICTIM COMPLETELY CONSCIOUS/ ALERT. DO NOT INDUCE VOMITING/RISK OF DAMAGE TO LUNGS EXCEEDS POISONING RISK. OBTAIN EMERGENCY MEDICAL ATTENTION.				
Emergency	AIRWAY PROTECTION MAY BE NECESSARY. BE PREPARED TO GIVE DXYGEN AND, IF NECESSARY, INTUBATE.				
Medical Treatment Procedures	TREAT BURNS OR ALLERGIC REACTIONS CONVENTIONALLY AFTER DECONTAMINATION.				
V111.	Spill and Disposal				
Precautions if Material is Spilled or Released	Material Spilled Released Released Released Research (See Sec. 111). Soak up small spill with inert solids. Use suitable disposal containers. On water, material soluble/may float or sink.may biodegrade. Contain/minimize dispersion/collect. Disperse Residue to Reduce aquatic Harm. Report per regulatory requirements. Contaminated Product/soil/water may be rcra/osha Hazardous waste due to potentially low flash point (see 40 cfr 261 and 29 cfr 1910). Landfill solids at permitted sites. Use registered transporters. Burn concentrated Liquids in systems compatible with water soluble wastes. Avoid flameouts. Assure emissions comply with applicable regulations. Dilute aqueous waste				
Waste Disposal Methods					
IX.	Components (This may not be a complete)				
Component N	Name CAS No. Carcinogen## Composition amount (Wt.)				
•	(See Qualification on Page 4				

Compositions given are typical values, not specifications.

X.		Physical and C	hemical Dat	a	
Boiling Point	(At 760.0 mm Hg) 79°C 174 F	Viscosity Units, Temp. (Me	thod) S AT 25°C	(KINEM)	Dry Point N/DA
Freezing Poi		Vapor Pressure (MM HG AT 20°C) A	P 71.2		Volatile Characteristics APPRECIABLE
	vity (H, O = 1 at 39.2°F)	Vapor Sp. Gr. (Air = 1.0 at AP 2.5	60'- 90'F) Solubili	ty in Water ECIABLE	
Hazardous Polymerization Other Chemical Reactivity NOT EXPECTED TO OCCUR N/P					Stability STABLE
Other Physicand Chemica					
Appearance and Odor	CLEAR, C	OLORLESS LIQUID WITH A	N ACETONE ODOR		
Conditions to Avoid	HEAT, SP	ARKS, AND OPEN FLAME			
Materials to Avoid					
Hazardous Decompositi Products		TE COMBUSTION MAY PROD	UCE CARBON MONOX	IDE AND C	ARBON DIOXIDE.
XI.		Additional I	Precautions		
Handling, Storage and Deconta— mination Procedures	torage "EMPTY" CONTAINERS WITH CARE/VAPOR RESIDUE MAY BE FLAMMABLE. VAPOR SPACE above Liquid may be flammable/explosive unless blanketed with inert gas.				
		FOUNTAINS AND SAFETY S		E AVAILABL	EIN
General Comments		•			
		ATION PRESENTED AND CON DIRECT TEST DATA ON TH			FROM
No	ote Qualifica	EQ = Equal tions: LT = Less Than GT = Greater Than	AP = Approximate UK = Unkown	N/AP =	o Applicable Information Found Not Applicable

Disclaimer of Liability

The information in this MSDS was obtained from sources which we believe are reliable. HOWEVER, THE INFORMATION IS PROVIDED WITHOUT ANY WARRANTY, EXPRESS OR IMPLIED, REGARDING ITS CORRECTNESS.

The conditions or methods of handling, storage, use and disposal of the product are beyond our control and may be beyond our knowledge. FOR THIS AND OTHER REASONS, WE DO NOT ASSUME RESPONSIBILITY AND EXPRESSLY DISCLAIM LIABILITY FOR LOSS, DAMAGE OR EXPENSE ARISING OUT OF OR IN ANY WAY CONNECTED WITH THE HANDLING, STORAGE, USE OR DISPOSAL OF THE PRODUCT.

XII

Label Information

Manufacturer:

ARCO CHEMICAL COMPANY
DIVISION OF ATLANTIC RICHFIELD COMPANY

1500 MARKET STREET

P.O. BOX 7258

PHILADELPHIA, PENNSYLVANIA 19101

Telephone Numbers

EMERGENCY

800/424-9300 CHEMTREC 215/353-8300 ARCO CHEM

CUSTOMER SERVICE

800/321-7000 INFO DNLY

Use Statement:

FOR INDUSTRIAL USE ONLY

KEEP OUT OF REACH OF CHILDREN

Signal Word:

DANGER

Physical Hazards:

EXTREMELY FLAMMABLE

Health Hazards:

INGESTION, INHALATION, AND SKIN CONTACT HAZARD SKIN AND EYE IRRITANT

Precautionary

Measures:

DO NOT HANDLE NEAR HEAT. SPARKS, OR OPEN FLAME.

KEEP CONTAINER CLOSED WHEN NOT IN USE.

DO NOT STORE NEAR COMBUSTIBLE MATERIALS

AVOID CONTACT WITH EYES, SKIN, AND CLOTHING. AVOID PROLONGED OR REPEATED BREATHING OF VAPOR.

AVOID PROLONGED OR REPEATED CONTACT WITH SKIN.

USE ONLY WITH ADEQUATE VENTILATION/PERSONAL PROTECTION.

PREVENT CONTACT WITH FOOD, CHEWING, OR SMOKING MATERIALS. WASH THOROUGHLY AFTER HANDLING. .

DO NOT TASTE/SWALLOW.

DOT Information:

Hazard Class-

UN/NA ID Number- UN 1193 FLAMMABLE LIQUID

Proper Shipping-

METHYL ETHYL KETONE (MEK)

Instructions:

DRY CHEMICAL C02

WATERSPRAY

WATER FOG

ALCOHOL TYPE FOAM

In case of fire, use-First Aid -Inhalation

IF OVERCOME BY EXPOSURE, REMOVE VICTIM TO FRESH AIR IMMEDIATELY. GIVE DXYGEN OR ARTIFICIAL RESPIRATION AS NEEDED. OBTAIN EMERGENCY MEDICAL ATTENTION. PROMPT ACTION IS ESSENTIAL

-Eye Contact

IN CASE OF EYE CONTACT, IMMEDIATELY RINSE WITH CLEAN WATER FOR 20-30 MINUTES. RETRACT EYELIDS OFTEN. OBTAIN EMERGENCY MEDICAL ATTENTION.

-Skin Contact

IMMEDIATELY REMOVE CONTAMINATED CLOTHING: WASH SKIN THOROUGHLY WITH MILD SDAP/WATER. FLUSH W/LUKEWARM WATER FOR 15 MINUTES. IF STICKY, USE WATERLESS CLEANER FIRST. SEEK MEDICAL ATTENTION IF ILL EFFECT OR IRRITATION DEVELOPS.

-Ingestion

IF SWALLOWED, GIVE LUKEWARM WATER (PINT) IF VICTIM COMPLETELY CONSCIOUS/ ALERT. DO NOT INDUCE VOMITING/RISK OF DAMAGE TO LUNGS EXCEEDS POISONING

RISK. OBTAIN EMERGENCY MEDICAL ATTENTION.

In case of spill,

Protective Equipment:

-Respiratory

USE NIOSH/MSHA APPROVED AIR-PURIFYING OR SUPPLIED AIR RESPIRATOR AS APPROPRIATE.

-Eye

CHEMICAL SPLASH GOGGLES AND/OR FACE SHIELD.

-Skin

PROTECTIVE CLOTHING INCLUDING GLOVES, APRON, SLEEVES, BOOTS, AND FULL HEAD/FACE PROTECTION.

001

Page 5 of 6

Label No.: BBHCRO00126

Revision No. 000 Issue No.

Date: 04/01/85 Date: 04/01/85



METHYL ETHYL KETONE

MSDS No. HCROOD126 Bev. Cate

X111.

Supplement

HEALTH HAZARDS-SUMMARY OF CHRONIC HAZARDS

MEK HAS BEEN SHOWN TO POTENTIATE THE NEUROTOXIC EFFECTS OF HEXANE, METHYL N-BUTYL KETONE, 5-NONANONE AND OTHER STRAIGHT CHAIN ALKANES CAPABLE OF BEING METABOLIZED TO GAMMA DIKETONES. THE EXACT MECHANISM OF THIS POTENTIATION IS UNKNOWN AND MAY BE SUFFICIENTLY INDEPENDENT OF THE METABOLIC FORMATION OF GAMMA-DIKETONES TO EXTEND OVER TO SUCH OTHER WELL KNOWN NEUROTOXINS AS ACRYLAMIDE AND THE DRGANOPHOSPHATES, TRIORTHOCRESYL PHOSPHATE AND LEPTOPHOS. THE NEUROPATHY IS INDUCED BY A "DYING BACK" TYPE DEGENERATION OF THE LARGE MOTOR AXONS OF THE PERIPHERAL NERVOUS SYSTEM. SYMPTOMS INCLUDE A PROGRESSIVELY WORSENING WEAKNESS OF THE EXTREMITIES WHICH STARTS IN THE FEET AND PROCEEDS PROXIMALLY. ATAXIA AND CNS INVOLVEMENT MAY FOLLOW IF EXPOSURE IS CONTINUED. THE CONDITION GROWS PROGRESSIVELY WORSE SEVERAL WEEKS FOLLOWING DISCONTINUANCE OF EXPOSURES BUT IMPROVES SUBSEQUENTLY AND IS CONSIDERED REVERSIBLE UNLESS CNS INVOLVEMENT EXISTS.

12/11/84



MATERIAL SAFETY DATA SHEET

EASTMAN CHEMICAL PRODUCTS, INC. Kingsport, Tennessee 37662

For Health Hazard Information, call: (615) 229-6094, 8am-5pm (Eastern), Mon.-Fri.

(615) 229-4374 at all other times

For other information, call: (615) 229-3339

Date of Preparation: 02-21-84

Approved by U. S. Department of Labor: Essentially Similar to OSHA-20

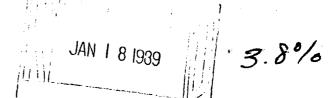
SECTION I. IDENTIFICATION

- Product Name: n-Butyl Alcohol

- Synonym: Butanol

- Formula: CH3CH2CH2CH2OH

- Molecular Weight: 74.12



SECTION II. PRODUCT AND COMPONENT HAZARD DATA

COMPONENT:

Approx. Percent CAS Reg. No.

n-Butyl alcohol

100 50 ppm 71-36-3

**See Section VI-A for additional information on exposure limits.

B. PRECAUTIONARY LABEL STATEMENTS:

WARNING! FLAMMABLE CAUSES EYE IRRITATION MAY BE HARMFUL IF INHALED

Keep away from heat, sparks, and flame. Avoid contact with eyes. Avoid breathing vapor or mist. Keep container closed. Use with adequate ventilation. Wash thoroughly after handling.



FIRST AID: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician. If inhaled, remove to fresh air. Treat symptomatically. Call a physician if symptoms persist.

IN CASE OF FIRE: Use water spray, dry chemical, "alcohol" foam, or CO2. Use water spray to keep fire-exposed containers cool.

IN CASE OF SPILL: Eliminate all ignition sources. Flush spill area with water spray. Prevent runoff from entering drains, sewers, and streams. Use water spray to dilute spill to a nonflammable mixture.

Since emptied packages retain product residue, follow label warnings even after package is emptied.

SECTION III. PHYSICAL DATA

- Appearance and Odor: Colorless liquid; odor similar to fusel oil.
- Boiling Point: 117°C (243°F)
- Melting Point: -89°C (-128°F)
- Specific Gravity ($H_20 = 1$): 0.811
- Vapor Pressure: 5.5 mm Hg at 20°C
- Percent Volatile by Volume: approx 100
- Vapor Density (Air = 1): 2.55
- Evaporation Rate (n-Butyl acetate = 1): 0.5
- Solubility in Water: 7.9%; moderate.

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

- Flash Point: 36°C (97°F)
 - Method Used: TCC
- Autoignition Temperature: 355°C (670°F); ASTM D-2155
- Flammable Limits: LEL 1.73% at 54°C UEL 10.7% at 94°C
- Extinguishing Agent: Water Spray, Dry Chemical, CO2, "Alcohol" Foam
- Special Fire-Fighting Procedures: Wear self-contained breathing apparatus and protective clothing to prevent contact with skin and eyes. Use water spray to keep fire-exposed containers cool.
- Unusual Fire and Explosion Hazards: Flammable liquid (see Section VIII). Vapors are heavier than air and may travel considerable distance to a source of ignition and flash back.

SECTION V. REACTIVITY DATA

- Stability: Stable.
- Incompatibility: Oxidizing materials can cause a vigorous reaction.
- Hazardous Decomposition Products: As with any other organic material, combustion will produce carbon dioxide and probably carbon monoxide.
- Hazardous Polymerization: Will not occur.

SECTION VI. TOXICITY AND HEALTH

A. EXPOSURE LIMITS

- OSHA Permissible Exposure Limit (PEL): 100 ppm-TWA.
- Threshold Limit Value (TLV): 50 ppm-C, "Skin Notation", ACGIH, 1983-84.
- A NIOSH industrial hygiene analytical method is available. (1)

B. EXPOSURE EFFECTS

Inhalation: Vapor may cause mucous membrane irritation, headache, dizziness, and in excess concentrations, narcosis (drowsiness, sleepiness, etc.).

Eyes: Liquid and vapor cause irritation.

Skin: Prolonged skin contact may produce irritation and result in some skin absorption.

MSDS-10,141A-2 (02-84) Replaces MSDS-5250

C. FIRST AID

Inhalation: Remove from exposure, treat symptomatically, and get medical attention if symptoms persist.

Eyes: Immediately flush with plenty of water for at least 15 min and get medical attention.

Skin: Flush thoroughly with water.

D. TOXICITY DATA

Test	Species · Result		Toxicity Classification (2)		
Acute oral LD50	Rat	2.5 g/kg (3)	Slightly toxic		
Acute oral LD50	Rat	4.36 g/kg (3)	Slightly toxic		
Acute oral LD50	Rabbit	3.4 g/kg(3)	Slightly toxic		
Inhalation LC50	Rat	>8520 ppm/6 h (4)	Slightly toxic		
Inhalation LC50	Rat .	>8000 ppm/4 h (3)	Slightly toxic		
Dermal LD50	Rabbit	5.3 g/kg (3)	Practically nontoxic		
Skin irritation	Rabbit	Slight (5)	• •		
Eye irritation	Rabbit	Strong (6)			

Signs of toxicity in animals exposed to n-butyl alcohol in air include: mucous membrane irritation, restlessness, ataxia, prostration and narcosis. Dermal applications to rabbits of 42 to 55 mL/kg/day for 1 to 4 consecutive days caused death in all the animals. (3)

Guinea pigs exposed to 100 ppm n-butyl alcohol in the atmosphere for 4 h/day at 64 days (1 day/wk omitted) showed weight gain but also some decrease in the number of red blood cells and a relative and absolute lymphocytosis. (7) Mice exposed repeatedly to an airborne concentration of 8000 ppm of n-butyl alcohol for a total of 130 h showed narcosis and reversible fatty liver change; however, the mice gained weight and there were no deaths. Rabbits exposed by dermal applications of 20 mL/kg/day of the compound for 30 days over a 6-wk period showed no deaths. (3)

Workers exposed to airborne concentrations of 200 ppm (or greater) n-butyl alcohol occasionally developed increasing corneal inflammation associated with burning sensation, blurred vision, tearing, photophobia, (beginning at the middle of the wk and growing more severe at the end of the wk) in addition to slight to moderate corneal edema and mild conjunctival edema; in each case, the conditions subsided over the weekend. At 100 ppm complaints of irritation were rare. (3)

SECTION VII. PERSONAL PROTECTION AND CONTROLS

A. RESPIRATORY PROTECTION

An appropriate NIOSH-approved respirator for organic vapor or mist should be worn if needed.

B. VENTILATION

General: Recommend at least ten air changes per hour for good general room ventilation.

Local Exhaust: Recommended to control mist and vapor. See Section VI-A for detailed information on exposure limits.

C. SKIN AND EYE PROTECTION

Safety glasses should be worn in any type of industrial operation. Protective gloves should be worn.

D. OTHER CONTROL MEASURES

An eye bath and washing facilities should be available. Wash thoroughly after handling.

SECTION VIII. SPECIAL STORAGE AND HANDLING PRECAUTIONS

Material is classified as a Flammable Liquid. Keep away from heat, sparks, and flame. Keep container closed. Use with adequate ventilation.

Since emptied packages retain product residue, follow label warnings even after package is emptied.

SECTION IX. SPILL, LEAK, AND DISPOSAL PRACTICES

Steps to be Taken in Case Material is Released or Spilled: Eliminate all ignition sources. Small spills may be collected with absorbent materials. For large spills, use water spray to dilute spill to a nonflammable mixture. Prevent runoff from entering drains, sewers, or streams.

Waste Disposal Method: Incineration. Observe all federal, state, and local laws concerning health and environment.

SECTION X. ENVIRONMENTAL EFFECTS DATA

A. SUMMARY: This product has been tested for environmental effects. Some laboratory test data and published data (4,8,9,10,11,12,13) are available for this product, and these data and have been used to provide the following estimate of environmental impact.

This product has a high biological oxygen demand, and it is expected to cause significant oxygen depletion in aquatic systems. It has a low potential to affect aquatic organisms. It is expected to be readily biodegradable and is not likely to bioconcentrate. If diluted with a large amount of water, this product released into the environment is not expected to have a significant impact.

B. OXYGEN DEMAND DATA

- COD: 1.90 g/g (8); 2.46 g/g (9) - BOD5: 1.1-2.04 g/g (8); 1.71 g/g (9)
- $-BOD_{20}$: 1.89 g/g (8)

C. ACUTE AQUATIC EFFECTS

- 24-h LC₅₀; Water flea: 1855 mg/L (10)
- 24-h LC₅₀; Creek chub: 1000-1400 mg/L (8)
- 24-h LC₅₀; Goldfish: 1900 mg/L (11)
- 48-h LC₅₀; Golden orfe (minnow): 1200 mg/L (4); 1770 mg/L (12)*

*Results of the same test carried out at two different laboratories.

D. BIOCONCENTRATION POTENTIAL

- Octanol/water partition coefficient: Log P = 0.32-0.89; P = 2.1-7.8 (13)

SECTION XI. TRANSPORTATION

DOT Hazard Classification: Flammable liquid

Flashpoint: See Section IV.

SECTION XII. REFERENCES

- 1. NIOSH Manual of Analytical Methods, 2nd Edition, Volume 2. Issued by the National Institute for Occupational Safety and Health. Washington, U. S. Government Printing Office, 1977, Method S66.
- 2. H. C. Hodge and J. H. Sterner. Tabulation of toxicity classes. Am. Ind. Hyg. Assoc. Q. 1949; 10:93-96.
- 3. G. D. Clayton and F. E. Clayton, Editors. Patty's Industrial Hygiene and Toxicology, 3rd Revised Edition, Volume 2C. New York, Wiley-Interscience, 1982, pp. 4571-4578.
- 4. Unpublished data, Health, Safety, and Human Factors Laboratory, Eastman Kodak Co., Rochester, New York.
- 5. J. F. Treon, Unpublished data.
- 6. H. F. Smyth, Jr., C. P. Carpenter and C. S. Weil. Range-finding toxicity data, List IV. Arch. Industr. Hyg. 1951; 4:119-122.
- 7. F. A. Patty, Editor. <u>Industrial Hygiene and Toxicology</u>, 2nd Revised Edition, Volume II. New York, Wiley-Interscience, 1963, p. 1443.
- 8. K. Verschueren. Handbook of Environmental Data on Organic Chemicals. New York, Van Nostrand Reinhold Company, 1977, pp. 136-137.

- 9. A. L. Bridie, C.J.M. Wolff, and M. Winter. BOD and COD of some petrochemicals. Water Res. 1979; 13(7):627-630.
- 10. V. G. Bringmann and R. Kuehn. Results of the damaging effect of water pollutants on Daphnia magna. Z. Wasser Abwasser Forsch. 1977; 10(5):161-166 (in German).
- 11. A. L. Bridie, C.J.M. Wolff, and M. Winter. The acute toxicity of some petrochemicals to goldfish. Water Res. 1979; 13:623-626.
- 11. I. Juhnke and D. Leudemann. Results of the study of 200 chemical compounds on acute fish toxicity using the golden orfe test. Z. Wasser Abwasser Forsch. 1978; 11(5):161-164 (in German).
- 13. A. J. Leo and C. Hansch, Editors. Chemical Parameter Data Base, Medicinal Chemistry Project, Pomona College, Seaver Chemistry Laboratory, Claremont, California, July 10, 1980.

The information contained herein is furnished without warranty of any kind. Users should consider these data only as a supplement to other information gathered by them and must make independent determinations of suitability and completeness of information from all sources to assure proper use and disposal of these materials and the safety and health of employees and customers.

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Hoedist Gelanese

Hoechst Celanese Chemical Group

P.O. Box 569320 / Dallas, Texas 75356-9320 Information Phone: 214-689-4000

Information Phone: 214-689-4000 Emergency Phone: 800-835-5235

METHYL ISOBUTYL KETONE

S-322.

4.0%

#64

Issued January 1, 1988

Identification

Product name: Methyl isobutyl ketone Chemical name: Methyl isobutyl ketone

Chemical family: Ketone Formula: CH₃COCH₂CH(CH₃)₂

Molecular weight: 100
CAS number: 108-10-1

CAS name: 4-Methyl-2-pentanone

Synonyms: 4-Methyl-2-pentanone; 2-methyl-4-pentanone; MIBK; isobutyl methyl ketone; isopropyl acetone.

Department of Transportation Information Hazard classification: Flammable Liquid Shipping name: Flammable Liquid NOS (Methyl Isobutyl Ketone)

United Nations number: UN 1993
DOT Emergency Response Guide no.: 26

Physical data

Boiling point (760 mm Hg): 115.8°C (240°F)

Freezing point: -83.5° C (-118° F) Specific gravity (H_2 O = 1 @ 20/20°C): 0.8020

Vapor pressure (20°C): 28 mm Hg Vapor density (Air = 1 @ 20°C): 3.5

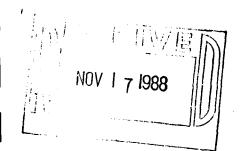
Solubility in water (% by WT @ 20°C): 1.9

Percent volatiles by volume: 100 Evaporation rate (BuAc = 1): 1.6

Appearance and odor: Clear, colorless, mobile liquid with characteristic "ketone" odor.

Hazardous ingredients

Methyl isobutyl ketone, 99.8%



Fire and explosion hazard data

Flammable limits in air, % by volume

Upper: Lower:

: 8.0 : 1.2

Flash point (test method):

Tag closed cup (ASTM D56): 64°F (18°C)

Extinguishing media:

Use CO₂ or dry chemical for small fires, alcohol-type aqueous film-forming foam or water spray for large fires. Water may be ineffective but should be used to cool fire-exposed structures and vessels.

Special fire-fighting procedures:

Wear self-contained breathing apparatus (SCBA) and complete personal protective equipment when potential for exposure to vapors or products of combustion exists.

Unusual fire and explosion hazards:

Vapor is heavier than air and can travel considerable distance to a source of ignition and flashback. Material creates a special hazard because it floats on water.

Special hazard designations

	HMIS	NFPA	Key
Health:	2	2	0 - Minimal
Flammability:	3	3	
Reactivity:	0	0	1 - Slight 2 - Moderate
Personal protective			3 - Serious
equipment:	G		4 - Severe

OSHA 29CFR1910.1200 evaluation: Hazardous

Reactivity data

Stability:

Stable

Hazardous polymerization:

Will not occur.

Conditions to avoid: Heat, sparks and flame.

Materials to avoid:

Caustic soda and other strong alkalis; hydrochloric, sulfuric and other strong inorganic acids; amines; oxidizing agents such as hydrogen peroxide, nitric acid, perchloric acid or chromium trioxide.

Hazardous combustion or decomposition products: Carbon monoxide.

Health data

Permissible exposure limits

OSHA standard: 100 ppm, 8-hr TWA
ACGIH TLV*: 50 ppm, 8-hr TWA; 75 ppm,

15-min STEL

Immediately Dangerous to Life and Health level:

3000 ppm

Effects of exposure/toxicity data

Acute:

Ingestion (swallowing): May cause mental sluggishness. Slightly toxic to animals (oral LD50, rats: 2.1 g/kg).

Inhalation (breathing): Causes irritation of nasal passages and throat. Can cause stupor. Slightly toxic to animals (inhalation LCLo, rats, 15 min: 4000 ppm).

Skin contact: Essentially non-irritating.

Beneated or prolonged contact can

Repeated or prolonged contact can cause drying of skin. Slightly toxic to animals by absorption (dermal LD50, rabbits: >3 g/kg).

Eye contact: Liquid and vapors are slightly to moderately irritating to the eyes upon contact. Can cause injury which may persist for several days.

Chronic:

Mutagenicity: In vitro, no information. In vivo, no information.

Carcinogenicity: No information. Reproduction: No information.

Other: Increased weights of rat and mouse livers in inhalation study (1000 ppm, 14 weeks). Can damage kidneys.

Emergency and first aid procedures

Ingestion (swallowing): Do not induce vorniting. Immediately give two glasses of water or milk. Contact a physician immediately.

Inhalation (breathing): Remove patient from contaminated area. If breathing has stopped, give artificial respiration, then oxygen if needed. Contact a physician immediately.

Skin contact: Remove contaminated clothing and wash contaminated skin with large amounts of water. If irritation persists, contact a physician.

Eye contact: Flush eyes with water for at least 15 minutes. Contact a physician immediately.

#64

Issued January 1, 1988

Spill or leak procedures

Steps to be taken if material is released or spilled:

Eliminate ignition sources. Avoid eye or skin contact. Place leaking containers in well-ventilated area. If fire potential exists, blanket spill with foam or use water spray to disperse vapors. Contain spill to minimize contaminated area and facilitate salvage or disposal. To clean up spill, flush area sparingly with water or use an absorbent. Avoid runoff into storm sewers and ditches which lead to natural waterways. Call the National Response Center (800-424-8802) if spill is equal to or greater than reportable quantity (5000 lb/day) under "Superfund". All clean-up and disposal should be carried out in accordance with federal, state and local regulations. If required, state and local authorities should be notified.

Waste disposal method:

This product when spilled or disposed is a hazardous solid waste as defined in Resource Conservation Recovery Act regulations (40CFR261). Preferred method is incineration or biological treatment in federal/state approved facility.

Special protection information

Respiratory protection:

Use full-face NIOSH-approved organic vapor cartridge or canister respirator within use limitations of these devices; in all other situations, use self-contained breathing apparatus (SCBA).

Ventilation

Local exhaust: Recommended when appropriate to control employee exposure.

Mechanical (general): Not recommended as the sole means of controlling employee exposure.

Protective gloves:

Neoprene or rubber.

Eye protection:

Chemical safety goggles.

Other protective equipment:

For operations where spills or splashing can occur, use impervious body covering and boots. A safety shower and eye bath should be available.

Special precautions

Precautions to be taken in handling and storing:

Store in a cool, well-ventilated area. Keep away from heat, sparks and flame. Keep containers closed. Use spark-resistant tools. When transferring follow proper grounding procedures. Use with adequate ventilation. Avoid breathing vapor. Avoid contact with eyes, skin and clothing. Wash thoroughly with soap and water after handling. Wash contaminated clothing thoroughly before re-use. Discard contaminated leather clothing.

Hoechst Celanese Chemical Group PO. Box 569320 Dallas, Texas 75356-9320 / 214-689-4000

INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL SAFETY DATA SHEET

NOTE: NO REPRESENTATION IS MADE AS TO THE ACCURACY OF THE INFORMATION HEREIN. SEE PAGE 7 FOR CONDITIONS UNDER WHICH DATA ARE FURNISHED.

5.9%

<u> i</u>	
Trade Name and Synon	yms
70309 TOLUENE	Emergency Telephone No.
Manufacturer's Name Texaco Chemical	4
Address	Company
	Place P.O. Box 430 Bellaire, TX 77401
Chemical Name and/or	
Aromatic Hydrod	carbon
THIS PRODUCT IS CL	ASSIFIED AS: NOT HAZARDOUS:
X HAZARDOUS	BY DEFINITION NO.(S) 1,2,5 ON ATTACHED EXPLANATION SHEETS
WARNING STATE WARN	MENT: ING! FLAMMABLE
•	VAPOR MAY BE HARMFUL MAY CAUSE IRRITATION TO EYES JAN 1 6 1989
OCCUPATIONAL	CONTROL PROCEDURES
Protective Equipment (Eyes:	(Type) Chemical type goggles or face shield optional.
Skin:	Exposed employes should exercise reasonable personal cleanliness; this includes cleansing exposed skin areas several times daily with soap and water, and laundering or dry cleaning soiled work clothing at least weekly.
Inhalation:	Supplied air respiratory protection for cleaning large spills or upon entry into tanks, vessels, or other confined spaces.
Ventilation:	Local exhaust ventilation recommended
Permissible Concentra	tions:
Air:	100 ppm averaged over an 8 hour exposure (ACGIH 1987-88). 200 ppm OSHA PEL.
EMERGENCY AN	D FIRST AID PROCEDURES
First Aid Eyes:	Flush with water for fifteen minutes.
Skin:	Wash exposed areas with soap and water.
Ingestion:	Do NOT induce vomiting. Aspiration of the fluid can cause serious lung injury, i.e. chemical pneumonitis. CALL A DOCTOR IMMEDIATELY.
Inhalation:	Should symptoms noted under physiological effects occur, remove to fresh air. If not breathing, apply artificial respiration.
Other Instructions:	None.



PHYSIOLOGICAL I	EFFECTS: Code No. 70309
Effects of Exposure Acute: Eyes:	Believed to cause slight-moderate eye irritation.
Skin:	Believed to be slightly irritating with possible redness, edema or drying of the skin. May cause dermatitis on prolonged or repeated contact.
Respiratory System:	Fatigue, weakness, headache, dizziness, vomiting. At higher concentrations, confusion and CNS depression.
Chronic:	Prolonged exposure to high concentrations may produce loss of appetite, nose bleeds, and liver, kidney and neural dysfunction.
Other:	-See additional comments pg. 6
Sensitization Propertie	9S:
Skin: Yes	No Unknown _X Respiratory: Yes No Unknown _X
Median Lethal Dose (I	
Inhalation	LC50 (rat) = 8000 ppm, 4 hrs.
Dermal	LD50 (rabbit) = 14.0 g/kg; practically non-toxic
Other	N. D
1	ation of Irritation (Species)
Skin	Believed to be 0.5-3.0/8.0 (rabbit); slightly irritating
Eyes	Believed to be 15-25/110 (rabbit): slightly irritating
Symptoms of Exposu	re See above and additional comments page 6.
FIRE PROTECTIO	N INFORMATION
Ignition Temp. ^O F	896 Flash Point OF. (Method) 40 F (TCC)
Flammable Limits (%)	Lower 1.4 Upper 7.6
Products Evolved Wi	nen Subjected to Heat or Combustion: Carbon monoxide and carbon dioxide may be formed on burning in
	limited air supply.
Recommended Fire E	extinguishing Agents And Special Procedures: According to the National Fire Protection Association Guide 325M,
	use dry chemical, foam or carbon dioxide. Water may be ineffec-
	tive on the flames, but water should be used to keep fire-exposed
·	containers cool. If a leak or spill has not ignited, use water
	spray to disperse the vapors and to provide protection for the
	persons attempting to stop the leak.
Unusual or Explosive	Hazards: Vapors heavier than air, may travel, be ignited at remote loc-
	ations and flash back. Explosive air-vapors mixtures may occur.



ENVIRONMENTAL PROTECTION Code No. 70309	
Waste Disposal Method: Re-evaluation of the product may be required by the user at the time of disposal, since the product uses, transformations, mixtures and processes may change classification to non-hazardous or hazardous for reasons other than, or in addition to ignitability. (See Remarks for Waste Classification.)	
Procedures in Case of Breakage or Leakage: (Transportation Spills Call CHEMTREC (800) 424-9300) Eliminate all ignition sources including internal combustion eng- ines and power tools. Ventilate area. Avoid breathing vapor. Use SCBA or supplied-air mask for 1g spills or in confined areas.Con- tain spill. Remove with inert absorbant. Avoid contact with eyes.	
Remarks: Waste Classification: Product (as presently constituted) has the RCRA characteristic of ignitability and if discarded in its purchased form would have the hazardous waste number D001.	
PRECAUTIONS	
WARNING! FLAMMABLE VAPOR MAY BE HARMFUL MAY CAUSE IRRITATION TO EYES	
Keep away from heat, sparks and flame. Avoid breathing vapor Keep container closed. Avoid contact with eyes. Use only in well-ventilated locations. Avoid prolonged or repeated con- tact with skin. Keep head away from container when opening or dispensing. Wash thoroughly after handling.	
Requirements for Transportation, Handling and Storage: Transport, handle and store in accordance with OSHA Regulation 1910.106 and and applicable DOT regulations.	
DOT Proper Shipping Name: Toluene DOT Hazard Class (if applicable): Flammable liquid UN 1294 RQ	
CHEMICAL AND PHYSICAL PROPERTIES	
Boiling Point (PF) 230 Vapor Pressure 36mm (886 F (mmHg)	ļ
Specific Gravity (Air = 1) Vapor Density (Air = 1)	
Appearance and Odor clear liquid, aromatic type odor	-
pH of undiluted product N.A. Solubility insol.	-
Percent Volatile by Volume 100 Evaporation 4.5 ()=1	
Viscosity N.D. Other	-
Hazardous Polymerizations ———— Occur ———————————————————————————————————	tails)

N.D. - Not Determined N.A. - No < - Less Than > - Gr



Chemical/Common Name	CAS No.	Exposure Limit	Range in %
*Toluene	108883	100ppm TWA ACGIH	100.0
*Benzene	71432	10ppm TWA ACGIH 1 ppm TWA OSHA 5 ppm STEL OSHA	0.01 - 0.0

I. Title III Section 302 Component	/304 Extremely Hazard	ous Substanc	e CAS No.	9/	BO ## 1	TDC #: :
NONE	·		CAS IND.	9/0	RQ (Lbs)	TPQ (Lbs)
	•					
II. CERCLA Section 10 Component	2(a) Hazardous Substance	e	CAS No.	%	RQ (Lbs)	
Toluene			108883	100.00	1,000	
Benzene			71432	0.01-0.09	1,000	
III. Title III Section 31 Acute	1 Hazard Categorization Chronic	Fire	Pressure	Reactive	Not Applicable	
X IV. Title III Section 31	X 3 Toxic Chemicals	x			.voc r.pp.iicabie	
Component			CAS No.	%		

PRODUCT SHIPPING LABEL

Code No.

70309

70309 TOLUENE

WARNING! FLAMMABLE

VAPOR MAY BE HARMFUL

MAY CAUSE IRRITATION TO EYES

Keep away from heat, sparks and flame. Avoid breathing vapor Keep container closed. Avoid contact with eyes. Use only in well-ventilated locations. Avoid prolonged or repeated contact with skin. Keep head away from container when opening or dispensing. Wash thoroughly after handling.

In case of contact, flush eyes with plenty of water for at least 15 minutes. If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Call a doctor If swallowed, DO NOT induce vomitting. Call a doctor.

In case of fire use water spray, foam, dry chemical or CO2.

Chemical/Common Name	CAS No.	Range in %
*Toluene	108883	100.00
*Benzene	71432	0.01 - 0.09

*Hazardous according to OSHA (1910.1200) or one or more state Right-To-Know lists.

HMIS

Health : 2 Reactivity : 0

Flammability: 3 Special : -

DOT Proper Shipping Name: Toluene

DOT Hazardous Class : Flammable liquid UN 1294 RQ

CAUTION: Misuse of empty containers can be hazardous. Empty containers can be hazardous if used to store toxic, flammable, or reactive materials. Cutting or welding of empty containers might cause fire, explosion or toxic fumes from residues. Do not pressurize or expose to open flame or heat. Keep container closed and drum bungs in place.

HEALTH EMERGENCY TELEPHONE: (914) 831-3400 (EXT. 204)

Texaco Inc. 2000 Westchester Avenue White Plains, New York 10650 For Additional Information Concerning:

Fuels/Lubricants/Antifreezes call (914) 831-3400 (EXT.204) Chemicals call (512) 459-6543 Transportation Spills call CHEMTREC (800) 424-9300



ADDI	$\Delta 1 \otimes C \cap N$	MENTS

Code No.

70309

TEXACO INTENDS TO COMPLY FULLY WITH PROVISIONS OF THE TOXIC SUBSTANCES CONTROL ACT STATE OF MICHIGAN CRITICAL MATERIALS ACT (REVISED 1987)
No critical materials present.

This product may produce or potentiate neurotoxic symptoms when used in conjunction with other organic solvents. Symptoms of neurotoxicity may include tingling and numbness of the extremties.

Product contains Benzene. Benzene has been associated with anemia and leukemia in humans and anemia, lymphoma and other cancers in laboratory animals.

Ames Mutagenicity Assay - Negative In vitro mouse lymphoma assay - Negative In vivo rat bone marrow cytogenetics assay - Negative: 0.025 ml/kg, 0.082 ml/kg, 0.247 ml/kg intraperitoneal injection 5 exposures, 24 hrs. apart.

Dominant lethal assay - Negative: 100 ppm, 400 ppm by inhalation 6 hrs./day, 5 days/week, 8 weeks.

Teratogenesis in rat - Negative: 100 ppm, 400 ppm by inhalation days 6 through 15 of gestation.

Neurotoxicity - no exposure related neuropathological effects Reproductive potential - two generation assay 100 ppm, 500 ppm, 2,000 ppm. Significant growth inhibition in offspring noted only at 2,000 ppm. No effects seen at lower doses. No teratogenic effects seen at any dose level including 2,000 ppm.

To determine applicability or effect of any law or regulation with respect to the product, users should consult his legal advisor or the appropriate government agency. Texaco does not undertake to furnish advice on such matters.

By F. E. Bentley	Title Coordinator of Product Safety
Date	Revised, Supersedes 04-22-88



THE INFORMATION CONTAINED HEREIN IS BELIEVED TO BE ACCURATE. IT IS PROVIDED INDEPENDENTLY OF ANY SALE OF THE PRODUCT AS PART OF TEXACO'S PRODUCT SAFETY PROGRAM. IT IS NOT INTENDED TO CONSTITUTE PERFORMANCE INFORMATION CONCERNING THE PRODUCT. NO EXPRESS WARRANTY, OR IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE IS MADE WITH RESPECT TO THE PRODUCT OR THE INFORMATION CONTAINED HEREIN. DATA SHEETS ARE AVAILABLE FOR ALL TEXACO PRODUCTS. YOU ARE URGED TO OBTAIN DATA SHEETS FOR ALL TEXACO PRODUCTS YOU BUY, PROCESS, USE OR DISTRIBUTE AND YOU ARE ENCOURAGED AND REQUESTED TO ADVISE THOSE WHO MAY COME IN CONTACT WITH SUCH PRODUCTS OF THE INFORMATION CONTAINED HEREIN.

EXPLANATION OF THE INDUSTRIAL HYGIENE, TOXICOLOGY, AND MATERIAL SAFETY DATA SHEET

PRODUCT INFORMATION

Trade Name and Synonyms

Refer to the code number and name under which the product is marketed and the common commercial name of the product.

Manufacturer's Name and Address Self explanatory.

Chemical Name and/or Family or Description

Refer to chemical, generic, or descriptive name of single elements and compounds.

For purposes of this form, a product is defined as hazardous if it possesses one or more of the following characteristics: (1) has a flash-point below 200 degrees Fahrenheit, closed cup or subject to spontaneous heating; (2) has a threshold limit value as established by the American Conference of Governmental Industrial Hygenists and/or the Occupational Safety and Health Administration (with exception to petroleum oil mist). (3) a single dose oral LD50 below 500 mg/kg; (4) causes burns to the skin in the short-term exposure or is systemically toxic by skin contact: (5) has been demonstrated to be a skin or eye irritant or causes respiratory irritation; (6) may cause skin or respiratory sensitization; (7) has teratogenic. mutagenic or other toxic effects; (8) may cause asphyxia or pneumoconiosis; (9) in the course of normal operations may produce dusts, gases, fumes, vapor, mist, or smoke which have one or more of the above characteristics; (10) contains a component which may be carcinogenic according to NTP (National Toxicology Program), IARC (International Agency for Research on Cancer), OSHA (Occupational Safety and Health Administration), EPA (Environmental Protection Agency) and/or NCI (National Cancer Institute.); (11) has a median LC50 (RATS) in air of 200 ppm or less by volume of gas or vapor or 2.0 mg/l or less of mist, fume or dust when administered by continuous inhalation for one hour; (12) is a hazard as identified in the Product Shipping Label on page 5.

OCCUPATIONAL CONTROL PROCEDURES

(Consult your Industrial Hygienist or Occupational Health Specialist.)

Protective Equipment

Type of protective equiment that is necessary for the safe handling and use of this product.

Ventilation

Normal means adequate to maintain permissible concentrations.

Ventilation: type, i.e. local exhaust, mechanical, etc.

Permissible Concentrations

Indicates worker exposure limits, such as the Threshold Limit Value (TLV) as established by the American Conference of Governmental Industrial Hygienists or standards, promulgated by the Occupational Safety and Health Administration (e.g., PEL).

TLV-Time Weighted Average (TWA) is the concentration in air averaged over an 8 hour daily exposure.

TLV-Ceiling (C) is the ceiling limit on concentration that should not be exceeded during any part of the working day.

"Skin" Notation (ACGIH) indicates that dermal absorption can contribute to overall exposure following direct contact or exposure to airborne material.

Permissible Exposure Level (PEL) is the time weighted concentration in air averaged over an 8 hour daily exposure.

EMERGENCY AND FIRST AID PROCEDURES

Administer first aid and emergency procedures in case of eye and/or skin contact, ingestion and inhalation.

PHYSIOLOGICAL EFFECTS

Acute Exposures (Eye, Skin, Respiratory System)

Refers to the most common effects that would be expected to occur from direct contact with the product.

Chronic

Refers to the effects that are most likely to occur from repeated or prolonged exposure.

Sensitizer

Means a substance which will cause on or in normal living tissue, through an allergic or photodynamic process, a hypersensitivity which becomes evident on reapplication of, or exposure to, the same substance.

Median Lethal Dose or Concentration (LD50,LC50)

Refers to that dose or concentration of the material which will produce death in 50 per cent of the animals. For inhalation, exposure time is indicated.

Irritation Index

Refers to an empirical score (Draize Method) for eye and skin irritation when tested by the method described. If numbers are not available, an estimated score indicates whether or not the material is an irritant.



FIRE PROTECTION INFORMATION

Ignition Temperature

Refers to the temperature in degrees. Fahrenheit, at which a liquid will give off enough flammable vapor to ignite and burn continuously for 5 seconds.

Flash Point (Method used)

Refers to the temperature in degrees Fahrenheit, at which a liquid will give off enough flammable vapor to ignite.

Flammable Limits

Refers to the range of gas or vapor concentration, the second of the sec

Products Evolved When Subjected to Heat or Combustion:

The products evolved when this material is subjected to heat or combustion includes temperature at which oxidation or other forms of degradation occurs.

Recommended Fire Extinguishing Agents and Special Procedures

Specifies the fire fighting agents that should be used to extinguish fires. If unusual fire hazards are involved or special procedures indicated, this is specified.

Unsusual Fire or Explosive Hazards

Specifies hazards to personnel in case of fire, explosive danger.

ENVIRONMENTAL PROTECTION

Specifies how this product may be disposed.

Indicates precautions necessary in the event-that leakage or breakage occurs. Included are (a) clean-up procedures, (b) personal protective equipment if necessary, (c) hazards that may be created, i.e. fire, explosion, etc.

PRECAUTIONS

Label that is required or recommended.

Requirements for Transportation, Handling and Storage

Specifies handling and storage procedures. Gives ICC, DOT, or other regulations related to safety and health for transportation.

CHEMICAL AND PHYSICAL PROPERTIES

Boiling Point (or Range)

In degrees Fahrenheit or Celsius Boiling Point at 760 mmHg.

Vapor Pressure

Pressure exerted when a solid or tiquid is in equilibrium with its own vapor.

Specific Gravity

The ratio of the density of the product to the density of water.

Vapor Density

The ratio of the density of the vapor at saturation concentration (20 degrees Celsius or 68 degrees Fahrenheit) to the density of air at 760 mmHg.

Appearance and Odor

Refers 10 the general characterization of the material e.g. powder colorless liquid, aromatic odor, etc.

pH

Refers to the degree of acidity of basicity of the material in a specific concentration.

pH1-5 - STRONGLY ACIDIC pH5-7 - WEAKLY ACIDIC pH7-9 - WEAKLY BASIC pH9-14 - STRONGLY BASIC

Solubility

Refers to the solubility of a material by weight in water at room temperature. The term negligible, less than 0.1 %; slight, 0.1 to 1%; moderate, 1 to 10%; appreciable, 10% or greater. Gives solubility in organic solvents where appropriate.

Percent Volatile By Volume

Refers to the amount volatilized at 20 degrees Celsitis or 68 degrees Fahrenheit when allowed to evaporate.

Evaporation

Gives the rate of evaporation compared to a standard

Viscosity

Measure of flow characteristics in Kinematic viscosity in Centistokes.

Hazardous Polymerization

Hazardous polymerization is that reaction which takes place at a rate which produces large amounts of energy. Indicates whether it may or may not occur and under what storage conditions.

Does the Material React Violently

Indicates whether the material will react violently, releasing large amounts of energy when exposed under conditions listed.

Composition

Components of the product as required by OSHA (1910.1200) and one or more state Right to Know laws.

Texaco Inc.
2000 Westchester Avenue
White Plains, New York 10650
Phone (914, 821-3400 (Beacon



MATERIAL SAFETY DATA SHEET

EASTMAN CHEMICAL PRODUCTS, INC. Kingsport, Tennessee 37662

For Health Hazard Information, call: (615) 229-6094, 8am-5pm (Eastern), Mon.-Fri.

(615) 229-4374 at all other times

For other information, call: (615) 229-3339

Date of Preparation: 02-21-84

Approved by U. S. Department of Labor: Essentially Similar to OSHA-20

SECTION I. IDENTIFICATION

- Product Name: Isobutyl Alcohol

- Synonyms: Isobutanol; 2-Methyl-1-propanol

- Formula: CH₃CH(CH₃)CH₂OH - Molecular Weight: 74.12 OCT -- 1988

SECTION II. PRODUCT AND COMPONENT HAZARD DATA

A.	COMPONENT:	Percent	TLV**	CAS Reg. No.
	Isobutyl Alcohol	100	50	78-83-1

^{**}See Section VI-A for additional information on exposure limits.

B. PRECAUTIONARY LABEL STATEMENTS:

WARNING! FLAMMABLE
CAUSES EYE IRRITATION
HARMFUL IF INHALED

Keep away from heat, sparks, and flame. Avoid contact with eyes. Avoid breathing vapor. Keep container closed. Use with adequate ventilation. Wash thoroughly after handling.

FIRST AID: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Call a physician. If inhaled, remove to fresh air. Treat symptomatically. Call a physician if symptoms persist.

IN CASE OF FIRE: Use water spray, dry chemical, "alcohol" foam or $\rm CO_2$. Water may be ineffective in fighting the fire. Use water spray to keep fire-exposed containers cool.

IN CASE OF SPILL: Eliminate all ignition sources. Flush spill area with water spray. Prevent runoff from entering drains, sewers, and streams.

Since emptied packages retain product residue, follow label warnings even after package is emptied.

- SECTION III. PHYSICAL DATA

 Appearance and Odor: Colorless liquid, sweet odor.
- Boiling Point: 108°C (226°F)
- Melting Point: -108°C (-162.4°F)
- Specific Gravity ($H_20 = 1$): 0.803 @ $20^{\circ}/20^{\circ}C$
- Vapor Pressure: 9 mm Hg at 20°C
- Percent Volatile by Volume: >99
- Vapor Density (Air = 1): 2.55
- Evaporation Rate (n-butyl acetate = 1): 0.6
- Solubility in Water: 9.5%; moderate

SECTION IV. FIRE AND EXPLOSION HAZARD DATA

- Flash Point: 29°C (85°F)
 - Method Used: TCC
- Autoignition Temperature: 416°C (780°F); ASTM D-2155
- Flammable Limits: LEL 1.7% at 50.5°C UEL 10.6% at 94°C
- Extinguishing Agent: Water Spray, Dry Chemical, CO2, "Alcohol" Foam
- Special Fire-Fighting Procedures: Wear self-contained breathing apparatus and protective clothing to prevent contact with skin and eyes. Water may be ineffective for fire fighting. Use water spray to keep fire-exposed containers
- Unusual Fire and Explosion Hazards: Flammable liquid (see Section VIII). Vapors are heavier than air and may travel considerable distance to a source of ignition and flash back.

SECTION V. REACTIVITY DATA

- Stability: Stable.
- Incompatibility: Oxidizing materials can cause a vigorous reaction.
- Hazardous Decomposition Products: As with any other organic material, combustion will produce carbon dioxide and probably carbon monoxide.
- Hazardous Polymerization: Will not occur.

SECTION VI. TOXICITY AND HEALTH

EXPOSURE LIMITS

- OSHA Permissible Exposure Limit (PEL): 100 ppm.
- Threshold Limit Value (TLV): 50 ppm-TWA, 75 ppm-STEL, ACGIH, 1983-84.
- A NIOSH industrial hygiene analytical method is available. (1)

B. VENTILATION

General: Recommend at least ten air changes per hour for good general room ventilation.

Local Exhaust: If needed to control mist or vapor. See Section VI-A for detailed information on exposure limits.

C. SKIN AND EYE PROTECTION

Safety glasses should be worn in any type of industrial operation.

D. OTHER CONTROL MEASURES

An eye bath and washing facilities should be available. Wash thoroughly after handling.

SECTION VIII. SPECIAL STORAGE AND HANDLING PRECAUTIONS

Material is classified as a Flammable Liquid. Keep away from heat, sparks, and flame. Keep container closed. Use with adequate ventilation.

Since emptied packages retain product residue, follow label warnings even after package is emptied.

SECTION IX. SPILL, LEAK, AND DISPOSAL PRACTICES

Steps to be Taken in Case Material is Released or Spilled: Eliminate all ignition sources. Small spills may be collected with absorbent materials. For large spills, flush area with water spray. Prevent-runoff from entering drains, sewers, or streams.

Waste Disposal Method: Incineration. Observe all federal, state and local laws concerning health and environment.

SECTION X. ENVIRONMENTAL EFFECTS DATA

A. SUMMARY: This product has been tested for environmental effects. Some published data (7,8,9) are available for this product, and these data have been used to provide the following estimate of environmental impact.

This product has a high biological oxygen demand, and it is expected to cause significant oxygen depletion in aquatic systems. It has a low potential to affect aquatic organisms. It is readily biodegradable and is not likely to bioconcentrate. If diluted with a large amount of water, this product released into the environment is not expected to have a significant impact.

B. OXYGEN DEMAND DATA

- COD: 100% of ThOD or 2.6 g/g (7)

- BOD₅: 64% of ThOD (7)

C. ACUTE AQUATIC EFFECTS

- 96-h LC₅₀; Water flea: 1220 mg/L (8)

- 48-h LC50; Golden orfe (minnow): 1520 mg/L; 1750 mg/L (9)*

*Results of the same test carried out in two different laboratories.

SECTION XI. TRANSPORTATION

DOT Hazard Classification: Flammable liquid

Flashpoint: See Section IV.

SECTION XII. REFERENCES

1. NIOSH Manual of Analytical Methods, 2nd Edition, Volume 2. Issued by the National Institute for Occupational Safety and Health. Washington, U. S. Government Printing Office, 1977, Method S64.

- 2. H. C. Hodge and J. H. Sterner. Tabulation of toxicity classes. Am. Ind. Hyg. Assoc. Q. 1949; 10:93-96.
- 3. Unpublished data, Health, Safety, and Human Factors Laboratory, Eastman Kodak Co., Rochester, New York.
- 4. H. F. Smyth, Jr., C. P. Carpenter, C. S. Weil, and U. C. Pozzani. Range-finding toxicity data. Arch. Ind. Hyg. Occup. Med. 1954; 10:61-68.
- 5. G. D. Clayton and F. E. Clayton, Editors. Patty's Industrial Hygiene and Toxicology, 3rd Revised Edition, Volume 2C. New York, Wiley-Interscience, 1982, pp. 4579-4582.
- 6. F. A. Patty, Editor. <u>Industrial Hygiene and Toxicology</u>, 2nd Revised Edition, Volume II. New York, Wiley-Interscience, 1963, pp. 1447-1449.
- 7. K. Verschueren. Handbook of Environmental Data on Organic Chemicals. New York, Van Nostrand Reinhold Company, p. 397.
- 8. V. G. Bringmann and R. Kuehn. Results of the damaging effect of water pollutants on Daphnia magna. Z. Wasser Abwasser Forsch. 1977; 10(5):161-166 (in German).
- 9. I. Juhnke and D. Luedemann. Results of the study of 200 chemical commpounds on acute fish toxicity using the golden orfe test. Z. Wasser Abwasser Forsch. 1978; 11(5):161-164 (in German).

The information contained herein is furnished without warranty of any kind. Users should consider these data only as a supplement to other information gathered by them and must make independent determinations of suitability and completeness of information from all sources to assure proper use and disposal of these materials and the safety and health of employees and customers.



MATERIAL SAFETY DATA SHEET

Shell

7.3% MSDS NUMBER > 7.740-5

PAGE 1 OF

97002 (1-81)

SECTION I NAME	24 HOUR EMERGENCY	ASSISTANCE
PRODUCT SHELL CYCLO-SOL® 53 Solvent (EOR)	SHELL 713-473-9461 CHEMTREC 800-424-9300	HEALTH 2
CHEMICAL/ D AROMATIC 100	HAZARD RATING	FIRE 2
CHEMICAL Aromatic Hydrocarbon Solvent FAMILY	LEAST O SLIGHT O 1 SUIGHT O 1 STREME	ENBEACTIVITY O
SHELL CODE \$ 83420 C.A.S. NUMBER \$ 64742-95-6	2 3 4 4 5	<u></u>

SECTION II		
COMPOSITION	%	TOXICITY DATA
CYCLO-SOL 53	100	Oral LDss (rat) - 4.7g/kg
		Inhalation LCso (rat) = >3670ppm (8 hrs)
Aromatics	99.4	
Paraffins plus Naphthenes	0.6	
Olefins	<0.1	
	·	}

SECTION III

HEALTH INFORMATION

Acute Toxicity: Overexposure can lead to central nervous system depression producing such effects as headache, dizziness, nausea, and loss of consciousness.

Eye Contact: Short-term liquid or vapor contact may result in slight eye irritation. Prolonged and repeated contact may be more irritating.

Skin Contact: Prolonged and repeated liquid contact can cause defatting and drying of the skin which may result in skin irritation and dermatitis.

Inhalation: High concentrations or prolonged exposure to lower concentrations may be slightly irritating to mucous membranes.

Ingestion: Liquid ingestion may result in vomiting; aspiration (breathing) of vomitus into the lungs must be avoided as even small quantities in the lungs may result in chemical pneumonitis and pulmonary edema/hemorrhage.

SECTION IV

OCCUPATIONAL EXPOSURE LIMITS

None established.



MSDS NUMBER

7,740-5 PAGE 2 OF 4

97003 (1-81)

EMERGENCY AND FIRST AID PROCEDURES

Flush with water for 15 minutes while holding eyelids open. YE CONTACT: Get medical attention.

Wash with soap and water. Remove contaminated clothing and KIN CONTACT:

do not reuse until laundered. If persistent irritation occurs, get medical attention.

Remove victim to fresh air and provide oxygen if breathing NHALATION: is difficult. Give artificial respiration if not breathing.

Get medical attention.

Do not induce vomiting. If vomiting occurs spontaneously, GESTION: keep head below hips to prevent aspiration of liquid into

the lungs. Get medical attention.*

DTE TO THE PHYSICIAN: $ilde{eta}$ If more than 2.0 ml per kg has been ingested and $\overline{\mathbf{v}}$ omiting has not occurred, emesis should be induced with supervision. Keep victim's head below hips to prevent aspiration. If symptoms such as bss of gag reflex, convulsions or unconsciousness occur before emesis, astric lavage using a cuffed endotracheal tube should be considered.

SECTION VI			PHYSICAL	DA	\TA	·			1
ING POINT	>	315-346	MELTING POINT	Þ		VAPOR PRESSURE (mmHg)		10.3@100°F	
PECIFIC RAVITY (1 ₂ 0=1)	Þ	0.87	% VOLATILE BY VOLUME	>		VAPOR DENSITY (AIR=1)	•	4.3	
SCUBILITY IN WATER	•	Negligible	EVAPORATION RATE (BUTYL ACETATE=	ĕ , ▶	0.12				

PPEARANCE AND ODOR

ht colored liquid. Aromatic odor.

SECTION VII	FIRE AND EXPLOS	SION HAZARDS			
POINT AND METHOD USED		FLAMMABLE LIMITS/%	VOLUME IN AIR	LOWER	UPPER
16 F (TCC)				1	77
TINCUICUING MEDIA					

water fog, foam, dry chemical or CO2. Do not use a direct stream of Product will float and can be reignited on surface of water.

ECIAL FIRE FIGHTING PROCEDURES AND PRECAUTIONS

not enter confined fire space without proper protective equipment inluding a NIOSH approved self-contained breathing apparatus. Cool firekposed containers with water.

the case of large fires, also cool surrounding equipment and structures ith water.

L FIRE AND EXPLOSION HAZARDS



A SHEET

MSDS NUMBER

7,740-5 PAGE 3 OF 4

	MATERIAL	SAFETY	DAT
Shell	97004 (10-79)		

SECTION VIII	REACTIVITY		
STABILITY UNSTABLE X STABLE	HAZARDOUS POLYMERIZATION	MAY OCCUR	X WILL NOT OCCUP

CONDITIONS AND MATERIALS TO AVOID

Avoid heat, sparks, open flames and contact with strong oxidizing agents.

HAZARDOUS DECOMPOSITION PRODUCTS

Carbon monoxide, carbon dioxide and unidentified organic compounds may be formed during combustion.

SECTION IX

EMPLOYEE PROTECTION

RESPIRATORY PROTECTION

Use a NIOSH-approved respirator as required to prevent overexposure. accord with 29 CFR 1910.134, use either an atmosphere-supplying respirator or an air-purifying respirator for organic vapors.

PROTECTIVE CLOTHING

Wear impervious gloves and protective clothing as required to prevent skin: contact. Wear chemical goggles to prevent eye contact.

ADDITIONAL PROTECTIVE MEASURES

Use explosion-proof ventilation as required to control vapor concentrations.

SECTION X

ENVIRONMENTAL PROTECTION

SPILL OR LEAK PROCEDURES .

Caution. Combustible.

Large spills: Eliminate potential sources of ignition. Wear appropriate respirator and other protective clothing. Shut off source of leak only if safe to do so. Dike and contain. Remove with vacuum trucks or pump to storage/salvage vessels. Soak up residue with an absorbent such as clay, sand or other suitable material; place in leak-proof'drums for proper disposal. Flush area with water to remove trace residue; dispose of flush solutions in drums.

Small spills: take up with an absorbent material and place in leak-proof drums for disposal.

WASTE DISPOSAL

Dispose of in a facility approved under RCRA regulations for hazardous waste (See Sec. XIII). Containers must be leak-proof and tightly sealed..

ENVIRONMENTAL HAZARDS

This productris an "oil" under the Clean Water Act. KEEP OUT OF SURFACE WATERS AND ÄLY WATER COURSES OR SEWERS ENTERING OR LEADING TO SURFACE WATERS. See Section XIII.

心,IVIATERIAL SAFETY DATA SHEET

MSDS NUMBER

7,740-1 PAGE 4 OF 4

SECTION XI

SPECIAL PRECAUTIONS

aution.	Combustible.	
.auliun.	COMDUSTIBLE.	

store away from strong oxidizing agents in a cool, dry place with adequate entilation. Keep away from heat and open flames. Keep containers tightly sealed..

ash with soap and water before eating, drinking, smoking or using oilet facilities. Launder contaminated clothing before reuse.

DECTION AII INANSPONTATION RECOINEMENTS
FLAMMABLE LIQUID X COMBUSTIBLE LIQUID OXIDIZING MATERIAL ONN-FLAMMABLE GAS POISON, CLASS A CORROSIVE MATERIAL NOT HAZARDOUS BY D.O.T. REGULATIONS CLASSIFICATION FLAMMABLE GAS POISON, CLASS B IRRITATING MATERIAL OTHER-Specify below
.T. PROPER SHIPPING NAME
Petroleum Naphtha
HER REQUIREMENTS
O.T. Identification Number = Unl255. Guide Sheet 27. Not regulated
by D.O.T. in containers with a capacity of less than 100 gallons.
Storie in containers with a supersity of fees than 100 years not
SECTION XIII OTHER REGULATORY CONTROLS
PA,FDA,OSHA,USDA,CPSC,etc.
EAA - Clean Water Act (CWA) This product is classified as an oil under Section 311 of the Clean Water
Act. Spills entering (a) surface waters or (b) any watercourses or sewers
e tering/leading to surface waters that cause a sheen MUST be reported to
the National Response Center, 800-424-8802.
A - Resource Conservation and Recovery Act Regulations (RCRA) A produced, this material is a product and not a waste. If discarded or
intended to be discarded as is, it is an ignitable hazardous waste as defined in RCRA (40 CFR 261.21). The EPA hazardous waste number is DOO1.

nformation contained herein is based on data considered courate. However, no warranty is expressed or implied regardig the accuracy of these data or the results to be obtained from

assumes no responsibility for injury to vendee or third -sons proximately caused by the material if reasonable safety acedures are not adhered to as stipulated in the data sheet. dompnally, vendor assumes no responsibility for injury to e or third persons proximately caused by abnormal use of e material even if reasonable safety procedures are followed. irthermore, vendee assumes the visk in his use of the material.

BE SAFE

READ OUR PRODUCT SAFETY INFORMATION ... AND **PASS IT ON**

> **IPRODUCT LIABILITY LAW** REQUIRES IT

Manager

SHELL OIL COMPANY PRODUCT SAFETY AND COMPLIANCE OIL AND CHEMICAL PRODUCTS P.O. BOX 4320 HOUSTON, TEXAS 77210

DATE PREPARED

November 13, 1981

Ashland Chemical Company

MATERIAL SAFETY

FIRST AID:

DIVISION OF ASHLAND OIL, INC.

DATA SHEET P.O. BOX 2219, COLUMBUS, OHIO 43216 . (614) 809-3333

PAGE: 1 BUTYL ACETATE NORMAL U G 004106 ACCEPTED BY O.S.H.A. AS ESSENTIALLY SIMILIAN TO O.S.H.A. FORM 20 05 50 .042 8542580-DATA SHEET NO: 0017188-001 LATEST REVISION DATE: 08/78-78229 PRODUCT: 3670100 INVOICE: 683881 INVOICE DATE: 05/08/84 STEELCOTE MFG CO 3418 GRATIOT ST ST LOUIS MO 63103 TO: SAME ATTN: PURCHASING/SAFETY DEPT. SECTION I-PRODUCT IDENTIFICATION GENERAL OR GENERIC ID: ESTER HAZARÓ CLASSIFICATION: (03) FLAMMABLE LIQUID (173.115) SECTION II-HAZARDOUS COMPONENTS INGREDIENT PERCENT PEL TLV N- BUTYL ACETATE SECTION III-PHYSICAL DATA PROPERTY REFINEMENT MEASUREMENT INITIAL BOILING POINT FOR PRODUCT 260.00 DEG F DEG 126.66 10.00 VAPOR PRESSURE FOR PRODUCT DEG F DEG C) a VAPOR DENSITY UNAVAILAELE . 883 68. 00 20. 00 880 -SPECIFIC GRAVITY DEG F DEG C) 100.00% PERCENT VOLATILES EVAPORATION RATE BLOWER THAN ETHER SECTION IV-FIRE AND EXPLOSION DATA FLASH POINT (TOC DEG F 99.00 37.22 EXPLOSIVE LIMIT (PRODUCT) LOWER -EXTINGUISHING MEDIA: REGULAR FOAM OR CARNON DIOXIDE OR DRY CHEMICAL HAZARDOUS DECOMPOSITION PRODUCTS: MAY FORM TOXIC MATERIALS:, CARBON DIOXIDE AND CARBON MONOXIDE, VARIOUS HYDROCARBONS, ETC. SPECIAL FIREFIGHTING PROCEDURES: SELF-CONTAINED BREATHING APPARATUS WITH A FULL FACEPIECE OPERATED IN PRESSURE DEMAND OR OTHER POSITIVE PRESSURE MODE. JAL FIRE & EXPLOSION HAZARDS: VAPORS ARE HEAVIER THAN AIR AND MAY TRAVEL ALONG THE GROUND OR MAY BE MOVED BY VENTILATION AND IGNITED BY PILOT LIGHTS, OTHER FLAMES, SPARKS, HEATERS, SMOKING, ELECTRIC MOTORS, STATIC DISCHARGE, OR OTHER IGNITION SOURCES AT LOCATIONS DISTANT FROM MATERIAL HANDLING POINT.

NEVER USE WELDING OR CUTTING TORCH ON OR MEAN . JING OR CUTTING TORCH ON OR NEAR DRUM (EVEN EMPTY) BECAUSE JUST RESIDUE) CAN IGNITE EXPLOSIVELY. SECTION V-HEALTH HAZARD DATA PERMISSIBLE EXPOSURE LEVEL PPM THRESHOLD LIMIT VALUE PPM 150 EFFECTS OF OVEREXPOSURE: FOR PRODUCT EYES - CAN CAUSE SEVERE IRRITATION, REDNESS, TEARING, BLURRED VISION.
SKIN - PROLONGED OR REPEATED CONTACT CAN CAUSE MODERATE IRRITATION, DEFATTING,
DERMATITIS.
BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL IPPITATION BREATHING - EXCESSIVE INHALATION OF VAPORS CAN CAUSE NASAL IRRITATION,
DIZZINESS, WEAKNESS, FATIGUE, NAUSEA, HEADACHE, POSSIBLE UNCONSCIOUSNESS,
AND EVEN ASPHYXIATION.
SWALLOWING - CAN CAUSE GASTROINTESTINAL IRRITATION, NAUSEA, VOMITING, AND

I SKIN: THOROUGHLY WASH EXPOSED AREA WITH SOAP AND WATER. REMOVE CONTAMINATED CLOTHING. LAUNDER CONTAMINATED CLOTHING BEFORE RE-USE.

Ashland Chemical Company

DIVISION OF ASHLAND OIL, INC.

23-319

MATERIAL SAFETY DATA SHEET

P.O. BOX 2219, COLUMBUS, OHIO 43216 • (614) 889-3333

00410	6		BUTYL	ACETATE	NORMAL U	-	-311	
		SECTION V-				INUED)		
IF IN	EYES: FLUSH WITH OCCASIONALLY, GET	LARGE AMO	UNTS OF	WATER,			LOWER LIDS	
	ALLOWED: GIVE TWO STICKING FINGER D MOUTH TO AN UNCON			A PHYSI	E VOMITING CIAN. NEVE	TMMEDIA R GIVE A	HELY BY	
IF BR	EATHED: IF AFFECT DIFFICULT, ADMINI RESPIRATION. KEEP	STER OXYGE	N. IF E	REVIHTM	G HAS SIUP	BEO' GIA	C AKILLICIAI	_
		SEC	TION VI	-REACTI	VITY DATA			
HAZAR	DOUS POLYMERIZATI	ON: CANNOT	OCCUR					
	LITY: STABLE							
INCOM	PATABILITY: AVOID STRONG OXIDIZING		ITH:, !	STRONG A	LKALIES.,	STRONG M	INERAL ACID	g.,
		SECTION	VII-SP	ILL OR L	EAK PROCED	URES		
	TO UT TAKEN IN C							
SMALL	SPILL: ABSORB LI ABSURBENT MATERIA	QUID ON PA L AND TRAN	PER, VI	ERMICULI 0 HOOD.	TE, FLOOR	ABSORBEN	T, OR OTHER	
LARGE	SPILL: ELIMINATE LIGHTS, ELECTRICA SHOULD DE EXCLUDE STOP SPILL AT SOU TO SALVAGE TANK. FLOOR ABSORBENT C	L SPARKS). D FROM ARE PRCE, DIKE REMAINING	PERSO A OF SI AREA OI LIQUID	NS NOT W PILL UNT F SPILL MAY BE	EARING PRO IL CLEAN-U TO PREVENT TAKEN UP O	TECTIVE JP HAS BE SPREADI ON SAND,	EQUIPMENT EN COMPLETE NG, PUMP LI CLAY, EARTH	D. QUID
	CTSPOSAL METHOD:							
SMALI	SPILL: ALLOW VOL FOR VAPORS TO COM MATERIAL IN ACCOM	IPLETELY CL	EAR HO	OD DUCT	WORK. DISP	OSE OF R	SUFFICIENT EMAINING	TIME
LARGE	E SPILL: DESTROY E REGULATIONS.	IY LIQUID I	NCINER	ATION IN	ACCORDANC	E WITH A	PPLICABLE	
	CONTAMINATED ABSOLUTION LOCAL, STATE AND				N A LANDFI	LL IN AC	CORDANCE WI	TH
	SE	CTION VIII	-PROTE	CTIVE EG	DUIPMENT TO	BE USEC)	
	RATORY PROTECTION NIOSH/MSHA JOINTE OF PROPER ENVIRON NIOSH/MSHA RESPIF EQUIPMENT SUPPLIE IMPLEMENTED TO RE	N: IF TLV C LY APPROVED MENTAL CON RATORS UNDE IR). ENGINE	OF THE D AIR S NTROL. IR SPEC ERING	PRODUCT UPPLIED OSHA REC IFIED CO	OR ANY CON RESPIRATOR SULATIONS A	MPONENT I R IS AUVI ALSO PERM (SEE YOU	S EXCEEDED, SED IN ABSE HI OTHER UR SAFETY	
VENT	TLATION: PROVIDE S VENTILATION TO MA					OR LOCAL	EXHAUST)	
PROTI	ECTIVE GLOVES: WEA	R RESISTAN	IT GLOV	ES SUCH	AS:, NEOPE	RENE		
EYE I	PROTECTION: CHEMIC ADVISED, HOWEVER (CONSULT YOUR SAI	, OSHA REGL	JLATION	S ALSO F	PLIANCE WI PERMIT OTHE	ITH OSHA ER TYPE S	REGULATIONS SAFETY GLASS	ARE Ses.
OTHE	R PROTECTIVE EQUIP IMPERVIOUS CLOTH	PMENT: TO F	REVENT	REPEATE	OR PROLO	ONGED BKI	IN CONTACT,	WEAR
		TION IX-SPE	CIAL P	RECAUTIO	ONS OR OTHE	ER COMMEN	11 S	
	AINERS OF THIS MAT	TERIAL MAY N PRODUCT F	ĐE HAZ RESIDUE	ARDOUS N	HEN EMPTIE	ED. SINCE	E EMPTIED	
OVER	HAZARD PRECAUTION EXPOSURE TO MATER: EFFECTS IN LABORA	IAL HAS APP ATORY ANIMA	PARENTL	Y REEN F	FOUND TO CA	AUSE THE	FOLLOWING	ING
THE :	DAMAGE, BRAIN DAI INFORMATION ACCUM WARRANTED TO DIE ADVISED TO CONFIL APPLICABLE, AND	JLATED HERE Whether or: RM in advan	IGINATI VCE OF	NEED THA	ASHLAND OF	R NOT.	RECIPIENTS A	ARE



MATERIAL SAFETY DATA SHEET

MSDS NUMBER

7.610-3

PAGE 1 OF

Shell ,7002 (1-81)

SECTION I	NAME	24 HOUR EMERGENCY	ASSISTANCE
PRODUCT Shell 2	.ylene	SHELL 713-473-9461 CHEMTREC 800-424-9300	HEALTH 2
CHEMICAL/ SYNONYMS Xylol; Toluene	Dimethyl Benzene; Methyl	HAZARD RATING	FIRE 3
CHEMICAL Aromats	.c Hydrocarbon	MODERATE HIGH EXTREME	REACTIVITY C
SHELL CODE 83391	C.A.S. NUMBER	2 3 4	

SECTION II	INGREDIE	NTS
COMPOSITION	*	TOXICITY DATA
Shell Xylene		Oral LDse (rat)=>5.2ml/kg
•		Dermal LD: (rabbit) => 3.95m1/kg
		Inhalation LC: (rat)=6,350ppm (4 hr)
Xylenes; a mixture of ortho-, meta and para-xylenes	80	Ange Lang & Continues
Ethylbenzene	20	JAN 1 6 1939
Benzene typically <10ppm	o हे के क प्रकृत व	CHAIRA SE SENT SERVICE TO THE PARTY OF THE P
*formerly 63390		6

SECTION III HEALTH INFORMATION

Acute Toxicity: Overexposure can lead to central nervous system depression producing such effects as headache, dizziness, nausea and loss of consciousness.

Eye Contact: Short-term liquid or vapor contact may result in slight eye irritation. Prolonged and repeated contact may to be more irritating.

Skin Contact: Prolonged and repeated liquid contact can cause defatting and drying of the skin which may result in skin irritation and dermatitis.

Inhalation: High concentrations or prolonged exposure to lower concentrations may be slightly irritating to mucous membranes.

Ingestion: Liquid ingestion may result in vomiting; aspiration (breathing in) of liquid into the lungs must be avoided as liquid contact with the lungs can result in chemical pneumonitis and pulmonary edema/hemorrhage.

SECTION IV

OCCUPATIONAL EXPOSURE LIMITS

Xylene:

OSHA-PEL/TWA = 100ppm

·ACGIH-TLV/TWA = 100ppm· (skin)

-TLV/STEL = 150ppm (skin)

Ethylbenzene:

OSHA-PEL/TWA = 100ppm ACGIH-TLV/TWA = 100ppm -TLV/STEL = 125ppm

EMERGENCY AND FIRST AID PROCEDURES

EYE CONTACT:

ECTION V

Flush with water. If persistent irritation occurs, get

medical attention.

KIN CONTACT:

Wash with soap and water. Remove contaminated clothing and do not reuse until laundered. If persistent irritation

occurs, get medical attention.

LNHALATION:

Remove victim to fresh air and provide oxygen if breathing is difficult. Give artificial respiration if not breathing.

Get medical attention.

EGESTION:

DO NOT INDUCE VOMITING even though vomiting may occur. If vomiting occurs, keep head below hips to prevent aspiration of liquid into the lungs. Get medical attention.

TE TO PHYSICIAN: Depending upon the amount ingested and retained, as well as the toxicity of the product, gastric lavage should be considered. Keep patient's head below hips to prevent pulmonary aspiration. matose, a cuffed endotracheal tube will prevent aspiration. Consult a sison control center.

SECTION VI	PHYSICAL	DATA		
LING POINT 281 - 285	MELTING POINT)	PRESSURE 6 6 68 P	•
SPECIFIC SRAVITY (N. 10 10 10 10 10 10 10 10 10 10 10 10 10	% VOLATRE BY	Nitro HANN AN	VAPOR DENSITY 3.7	4,4
LUBILITY IN Negligible WATER	EVAPORATION RATE (BUTYL ACETATE= 1)	0.6		:

APPEARANCE AND ODOR

lorless liquid. Aromatic odor.

SECTION VII	SION HAZARDS		
FL SH POINT AND METHOD USED	FLAMMABLE LIMITS/% VOLUME IN AIR	LOWER	UPPER
BI'F (TCC)		1.0	7.0
EXTINGUISHING MEDIA			

water spray or fog, foam, dry chemical or CO2. Do not use a direct weter stream. Avoid accumulation of water as product will float. SPECIAL FIRE FIGHTING PROCEDURES AND PRECAUTIONS

not enter confined fire space without proper protective equipment inuding a NIOSH approved self-contained breathing apparatus. Cool fireexposed containers with water.

UAL FIRE AND EXPLOSION HAZARDS



Properly. ENVIRONMENTAL HAZARDS

MATERIAL SAFETY DATA SHEET MSDS NUMBER

7,610-3 PAGE 3 OF

SECTION	97004 (10-79		REACTI	VITY		
STABILITY			HAZARDOUS F	POLYMERIZATION	MAY OCCUR	X WILL NOT OCCU
1	AND MATERIALS TO					
Avoid h	eat, spark	s, open fla	mes and or	kidizing ma	terials.	
ł						
	DECOMPOSITION PR	001075				
1				nidontifio	t organice may	, he formed
	monoxide, combustion		(ide and u	nidencirie	organics may	be lormed
during	COMPASCION	•				
	•				* ·	
L						
SECTION	N IX		EMPLOYEE P	ROTECTION		
RESPIRATORY	PROTECTION					
Use a N	IOSH-appro	ved respira	ator as re	quired to	prevent overex	posure. In
						ing respirator
or an a	ir-purifyi	ng respira	tor for or	ganic vapo	rs.	$\frac{1}{2}$
PROTECTIVE	CLUTHING					. 1
			ctive clot		quired to min	lmize skin
ADDITIONAL	PROTECTIVE MEASE	IRF C				
1			tion on mo	anirad ta	control vapor	concentra-
tions.	JUSION-PIC	ol ventila	cion as le	quired to	COULTOI Vapor	concentra-
	• . •				•	. :
	·					
		·				
SECTION SPILL OR LEA	X AK PROCEDURES	EN	VIRONMENTAL	L PROTECTION	<u></u>	
1		lro and avn	logion haw	and when e	pilled Do no	nt use enark-
The second secon		_			suppress vap	
					tual spill ar	
					n. Evacuate	
all non	nessential	personnel.	Wear app	ropriate r	espirator and	other pro-
1					if safe to d	
1					-	alvage vessels
1					such as clay	
		in drums fo 1 dispose o			rea with wate	r to remove
1		_			rbent and pla	ce in drums.
Flush a	area with v	-			for disposal.	
WASTE DISP	OSAL					
					ty in complia	
[federa]	l and state	e regulatio	ns. Drums	must be t	ightly sealed	and labeled

The xylene in this product is designated as a hazardous substance under the Clean Water Act. KEEP OUT OF SURFACE WATERS OR SEWERS ENTERING OR LEADING TO SURFACE WATERS. (See Section XIII).

MATERIAL SAFETY DATA SHEET

MSDS NUMBER

7,610-3 PAGE 4 OF 4

97005 (REV. 7-82)

ECTION XI

SPECIAL PRECAUTIONS

re away from oxidizing materials in a cool, dry place with adequate exsion-proof ventilation. Keep away from heat, sparks and open flames. ound equipment to prevent accumulation of static charge. If pouring or ensferring materials, containers must be electrically interconnected grounded. Keep containers tightly sealed.

sh up with soap and water before eating, drinking, smoking or using let facilities. Launder contaminated clothing before reuse. Destroy reaminated leather items including shoes that cannot be decontaminated.

				
_				,
CTION XII	TR	ANSPORTATION REQ	UIREMENTS	in the second of the second
_				
	X FLAMMABLE LIQUID	COMBUSTIBLE LIQUID	OXIDIZING MATERIAL	NON-FLAMMABLE .
ARTMENT				
OF	FLAMMABLE SOLID	POISON CLASS A	CORROSIVE MATERIAL	NOT HAZAPOCUS BY
NSPORTATION /				
IFICATION	FLAMMABLE GAS	POISON, CLASS 8	IRRITATING MATERIAL	OTHER-Specify below
T. PROPER SHIPPING	NAME)
ne	*	ود ما ما چو وه د د ومان د دو	A CONTRACTOR OF THE STATE OF TH	± ४०० छाला - के हो व मिंछ तु के
EN REQUIREMENTS	* * * * * * * * * * * * * * * * * * * *		in an armine to the state of th	·····································
LT. Identi	ification Number	= UN 1307. Gu	ide 27.	THE RIGHT STATE OF
. a. \$175	Acres age in a might be get in get a fifth		可持续的 化 多数数 计图像数	·原珠山林内学引3001627.4倍移。
1 81 67 (3.3)	Print Triple & Cultivage Cultiva	ANGERS OF CHARACTERS OF STREET	STATE A AND SEPTEMBERS	etablish an letter dat lette
TION XIII		HER REGULATORY C	ONTROLS	
F.OSHA,USDA,CPS	jC,ete.			
A - Clean V	Water Act (CWA)		•	
im product	is classified a	s a hazardous s	ubstance under Sed	tion 311 of
_			urface waters or	
	_		surface waters NUS	_
		_	, 800-424-8802.	
	xylene is 1000	· .		
-	_		•	
A - Resoure	ce Conservation	and Recovery Ac	t (RCRA)	

product has been designated by the EPA (RCRA 40 CFR 261.33) as a

The EPA hazardous waste number for xylene is U239.

rdous waste if it is spilled, discarded or intended to be discarded as

information contained herein is based on data considered ata. However,no warranty is expressed or implied regardherecturacy of these data or the results to be obtained from isomethereof.

r assumes no responsibility for injury to vendee or third ns proximately caused by the material if reasonable safety dues are not adhered to as stipulated in the data sheet, ionally, vendor assumes no responsibility for injury to e or third persons proximately caused by abnormal use of name ial even if reasonable safety procedures are followed are revendee assumes the risk in his use of the material.

BE SAFE

READ OUR PRODUCT SAFETY INFORMATION ...AND

PASS IT ON

(PRODUCT LIABILITY LAW REQUIRES IT) John Physics

SHELL OIL COMPANY PRODUCT SAFETY AND COMPLIANCE OIL AND CHEMICAL PRODUCTS P.O. BOX 4320 HOUSTON,TEXAS 77210

DATE PREPARED

August 18. 1981

ATTACHMENT 2 STEELCOTE MANUFACTURING COMPANY PHOTOGRAPHS

ATTACHMENT 2 PHOTOGRAPHS

LOCATION:

STEELCOTE MANUFACTURING CO. FACILITY

DATE:

JUNE 9, 1989

PHOTOGRAPHER:

GREG UETRECHT, JEG INSPECTOR

FILM:

KODAK ASA 200

CAMERA:

NIKON 35MM

JACOBS FILE:

05C01700

WITNESS:

LAURIE SMITH



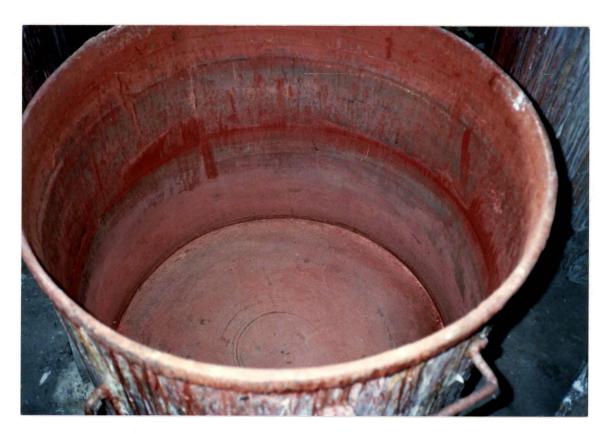
PHOTOGRAPH 1

OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject: Second floor, unlabeled drum collecting clean-up solvents

Time: 0858





PHOTOGRAPH 2

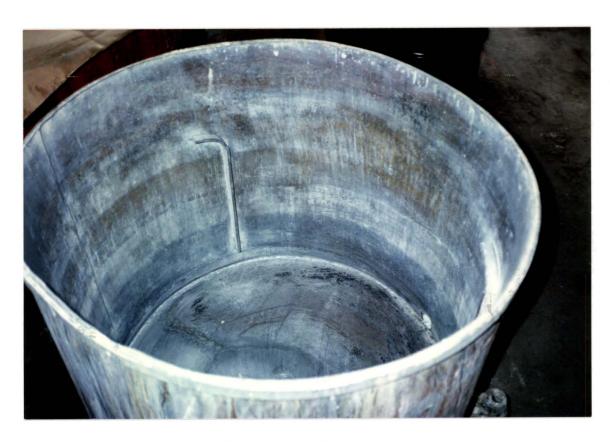
OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

100 gallon tank where coating or paint is mixed

Time:

0901



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Cleaned 100 gallon tank by solvents

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Ball Mill

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Solvent wash drums

Note:

Liquid sitting on top

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

F-Solvent drums unlabeled in still area

Note:

Some open drums

Time:



PHOTOGRAPH 7

OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject: Unlabeled F-Solvent drums in still area

Note: Open drums

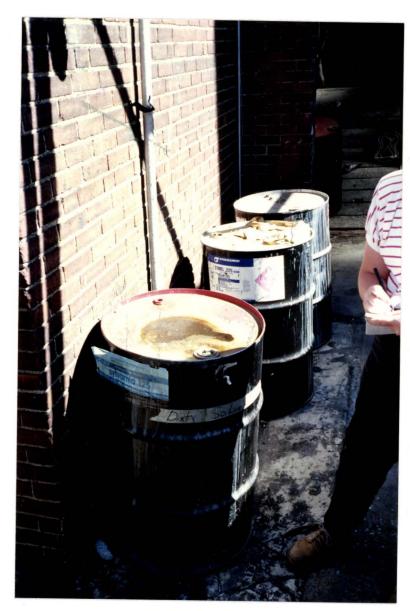
Time: 0942



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject: Unlabeled F-Solvent drums in still area

Note: 0942



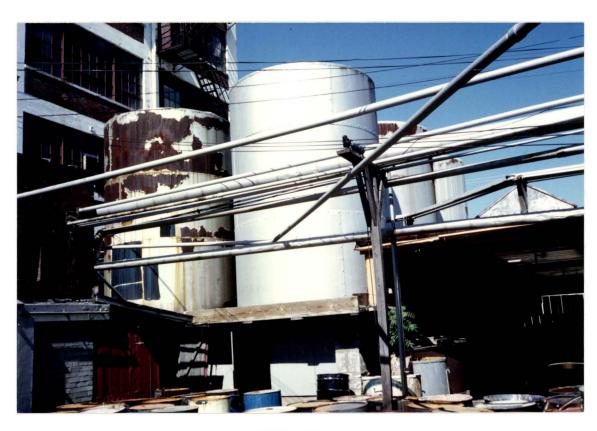
PHOTOGRAPH 9

OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Three full F-Solvent drums. Only label is "Dirty Solvent"

Time:

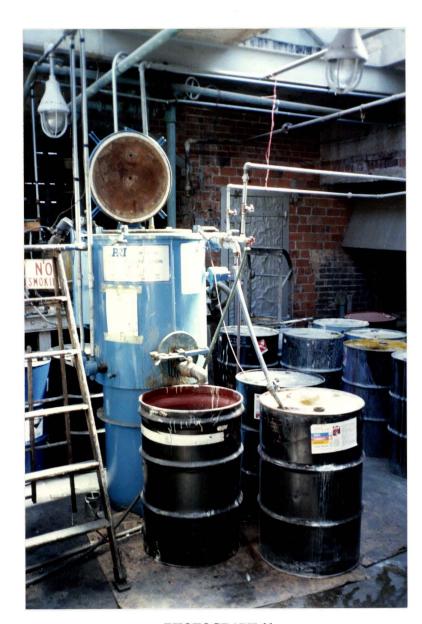


OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Above ground storage tanks presently used for test coatings

Time:



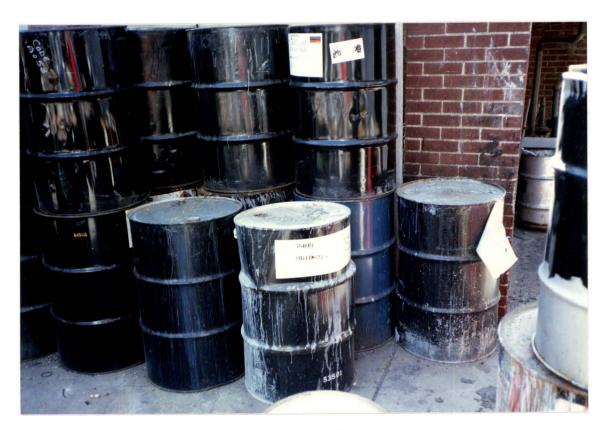
PHOTOGRAPH 11

OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

PRI Solvent Distillation Unit

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject: Wastes being stored for distillation. No labels on drums

NOTE: Drums two and three are open and Drum one has a label

Time: 0948



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Wastes being stored for distillation. No labels on drums

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject:

Aged inventory and returned product

Time:



OFFICIAL PHOTOGRAPH JACOBS ENGINEERING GROUP INC.

Subject: Aged inventory and returned product

Note: Poor coordination of materials and staining on the floor

Time: 0956

ATTACHMENT 3 LAND DISPOSAL RESTRICTIONS CHECKLIST

Facility Name: STEEL Cotte
EPA Id Number: Mod 006275 036

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form A - Restricted Waste Determination

Note: This form must be completed during all RCRA Compliance Evaluation Inspections (CEIs). Additional forms (B through F) may be required depending on types of wastes generated or handled. All Checks are based on Mr. Moores answer:									
Section I. Wastes restricted on November 7, 1986 (F-solvents and Dioxins)									
Check each box that applies (see Appendix A):									
F001 F004 F021 F026									
F002 F005 F022 F027									
F0031 F020 F023 F028									
None of the wastes listed above are handled by the generator. Complete Section II of this form. One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form D - Testing and Management of F-solvents and Dioxins. Applicable only if waste is ignitable.									
Section II. Wastes restricted on July 8, 1987 (California List)									
Check each box that applies:									
Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentration greater than 1000 mg/L.									
Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:									
$\mathcal{M}_{\mathcal{N}}$ Arsenic or compounds containing arsenic greater than 500 mg/L;									
Cadmium or compounds containing cadmium greater than 100 mg/L;									

Page 1 Revision: 1/1989

Facility Name: Steelcote

EPA Id Number: Mobook 275036

Form A - Restricted Waste Determination (cont'd)

Chromium or compounds containing chromium greater than 500 mg/L;

Lead or compounds containing lead greater than 500 mg/L;

Mercury or compounds containing mercury greater than 20 mg/L;

Nickel or compounds containing nickel greater than 134 mg/L;

Selenium or compounds containing selenium greater than 100 mg/L; or

Thallium or compounds containing Thallium greater than 130 mg/L.

Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.

Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L.

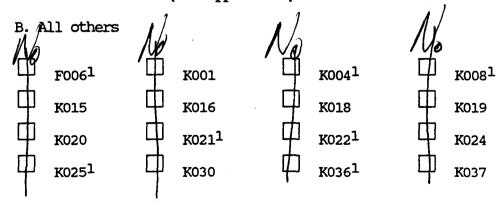
Liquid or nonliquid hazardous waste containing halogenated organic pompounds at concentrations greater than or equal to 1000 mg/Kg.

None of the wastes listed above are handled by the generator. Complete Section III of this form.

One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form E - Testing and Management of California List Wastes.

Section III. Wastes restricted on August 8, 1988 (First Third List)

1. Hard Hammer Wastes (see Appendix B)



Page 2

Facility Name: _ EPA Id Number:

Form A - Restricted Waste Determination (cont'd)

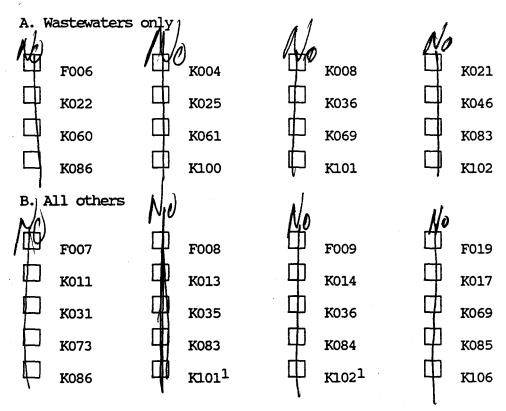
No		Mo		\mathcal{N}_{0}		16	
中	K044	甲	K045	′ 中	K046 ¹	甲	K047
中	K048 ²	中	K049 ²	中	K050 ²	中	K051 ²
中	K052 ²	ф	K060 ¹	中	K061 ¹	中	K062
中	K069 ¹	中	K071	中	K083 ¹	中	K0863
中	K087		K099	中	K100 ¹	P	K1014
Ф	K1024		K103	中	K104	,	

1 Nonwastewaters only, wastewaters have been soft hammered.
2 National Capacity Extension through May, 1990.

³ Solvent-wash subcategory, other subcategories have been soft hammered.

⁴ All wastewaters and nonwastewaters with less than 1% total As, high As wastewaters have been soft hammered.

2. Soft Hammer Wastes (see Appendix C)



Page 3

Facility Name: Steelcote
EPA Id Number: Mob006275031

11		Form A	Restricted	Waste	Determination	(œ	nt'd)
Mo		No		No		No	
中	P001	中	P004	中	P005	4	P010
中	P011	中	P012	中	P015	中	P016
中	P018	中	P020	中	P030		P036
中	P037	中	P039	. Ф	P041	\Box	P048
中	P 050	中	P058	甲	P059	甲	P063
中	P068	Ф	P069	中	P070	甲	P071
Ф	P081	Ф	P082	中	P084	Ф	P087
中	P089	中	P092	中	P094	Ф	P097
Ф	P102	甲	P105	中	P108		P110
中	P115	中	P120	甲	P122	甲	P123
中	U007	Ф	U009	P	U010	甲	U012
中	U016	中	U018	中	U019	4	U022
中	U029	Ф	U031	甲	U036	Ψ.	U037
Ф	U041	甲	U043	P	U044	4	U046
甲	U 050	甲	U051	P	U053	\mathbb{P}	U061
P	U063	甲	U064	甲	U066	甲	U067
中	U074	甲	U077	甲	U078	里	U086
P	U089	甲	U103	P	U105	甲	U108
中	U115	P	U122	里	U124	P	U129
甲	U130	P	U133	甲	U134	The state of the s	U137
甲	U151	P	U154	甲	U155	9	U157
中	U158	中	U159	甲	U171	4	U177
		1				1	

Page 4 Revision: 1/1989

					EPA 10	Number: _	1900	1042750	036
	For	m A -	Restrict	ed Waste	Determir	nation (co	ont!d)	,	
No		No		16		Mo	u,		
ф	U180	ф	U185	中	U188	4	U192		
9	U200	4	U209	中	U210	中	U211		
\Box	U219	4	U220	\mathbb{P}	U221	里	U223		
Ψ	U226	4	U227	P	U228	尸	U237		
P	U238	4	U248	Ψ	U249	•			
1 No	onwastewate	rs wit	h greate	r than 1%	As.				
	one of the omplete Second or more of omplete Formal Management	tion V of the m C - 1	I of this wastes: Manifest	s form. listed ab ing Restr	ove are icted Wa	handled h	ry the g∈	enerator	
Section	n IV. Waste	s rest	ricted of	n June 8,	1989 (5	Second Thi	rd)		
Section	n V. Wastes	restr	icted on	May 8, 1	990 (Ias	st Third)		·	
Section	VI. BDAT	Ireata	bility G	roup - Tr	eatment	Standards	: Identii	fication	. /
	the generaterent trea				tes whic	ch have		Yes V	No
If y	res,								

A. Did the generator select the most stringent treatment standard ?

Facility Name: Steeleste

Page 5

Revision: 1/1989

Inspector's Initials:

Facil	ity	Name:	_Steelcote
EPA I	d M	ımber:	MOD006275032

_Yes __ No

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form B - Treatment, Storage and Disposal

Note:	This form should be completed only if the generator or restricted wastes onsite for greater than 90 days or op regulated treatment or disposal units. Small quantity accumulate restricted wastes for less than 180(270) day from the following requirements.	erates RCRA- generators who
Secti	on I. General facility standards	
ac	s the facility's waste analysis plan been revised in cordance 264.13(b)(6) or 265.13(b)(6) to reflect quirements under 268.7 ?	Yes No
ph to	s the facility obtained representative chemical and ysical analysis of wastes and residues in accordance 264.13 or 265.13? **Waste analysis by yes,	* Yes * No Per Deloped
	Chemical and physical analyses of F-solvents and Dioxin	
	i. Has testing included analyses for all F-solvent constituents?	Yes No
	ii. Were all F-solvent constituents analyzed by employing the Toxicity Characteristic Leaching Procedure (TCLP) ?	Yes No
в.	Chemical and physical analyses of California List waste	s / /
	i. Were the following analyses conducted on California List wastes:	M.A.
	a. pH ?	Yes No
	b. Concentrations of PCBs ?	Yes No
	c. Concentration of Halogenated Organic Compounds ?	Yes No
	d. Heavy Metal concentration ?	Yes No

Page 1

Revision: 1/1989

e. Cyanide concentration ?

Facility Name:	_ Steele ote
EPA Id Number:	MODO06275036

Form B - Treatment, Storage and Disposal (cont'd)

C. Chemical and physical analyses of First Third List Wastes
i. Has the facility tested wastes with established treatment standards (hard hammer wastes) ? Yes No
if yes,
a. List these wastes and the test procedures used to determine concentrations below:
3. Were these analyses conducted onsite or offsite?
A. If offsite, identify lab: Chemtech fab. St. Louis, Mo
4. Describe the frequency of sampling restricted wastes below: Done by treatment facility upon receiving ship ment
- for generator. I this is the reclaimed +
Attach copy of most recent waste analysis. * Note: This is the reclaimed to the fee his most recent, no refer to Aug. 1988 letter which is most recent at Solvent, no at Specify however waste analysis is under olevelopment
at facility, however waste analyses is under olevelopment
Section II. Storage of Restricted Wastes American Resource Recovery
1. Have restricted wastes exceeding treatment standards been
stored? if fes, his far h. Morres! V Yes _ No
A. Have all containers been clearly marked to identify contents and date(s) entering storage? Yes No
B. Do operating records track location, quantity, and
dates that restricted wastes entered and were removed
from storage?Yes No
C. Do records agree with container labeling?Yes No
D. Are restricted wastes stored for less than 1 year ? Yes No
E. Have tanks been emptied at least once per year, and do operating records show that volumes of restricted wastes removed from tanks at least equal tank volume? Yes No
Page 2

Facility Name:	Steelcote
EPA id Number:	MOD006275036

Form B - Treatment, Storage and Disposal (cont'd)

	F. Have restricted wastes been stored for more than one year ?	Yes	No
	i. If yes, can the owner/operator demonstrate that the purpose of such storage has been solely conducted for accumulating sufficient quantities of restricted wastes to facilitate proper recovery, treatment, or disposal?	Yes _	No
Se	ction III. Storage or treatment in surface impoundments		
1.	Have restricted wastes exceeding treatment standards been placed in surface impoundments?	Yes _	No
	A. If yes, have these wastes and their residues been removed at least annually?	Yes _	No
	B. If no, skip the remainder of this section.		
2.	Have these wastes been placed for treatment?	Yes	No
	A. If yes, describe treatments processes below:		
3.	Is the only recognizable "treatment" occurring in the impoundment either evaporation, dilution, or both?	Yes _	N o
4.	Did the facility submit a certification of compliance with minimum technology and groundwater monitoring requirements and the waste analysis plan to the Agency?		No
5.	Have minimum technology requirements been met ?	Yes	No
	A. If no, have waivers been granted for each restricted waste management unit ?	Yes _	N o
6.	Have all 264/265 Subpart F groundwater monitoring requirements been met ?	Yes _	No

Page 3 Revision: 1/1989

Facility Name:	Steeleote
EPA Id Number:	MOD000275034

Form B - Treatment, Storage and Disposal (cont'd)

7.	ap an	ve representative samples of sludge and supernatant from plicable surface impoundments been tested adequately in accordance with sampling frequency and analysis ecified in the waste analysis plan?		Yes_	No
	A.	Are test results maintained in the operating record?	·	Yes _	No
	В.	Did hazardous waste residues (i.e. sludge or liquid) exceed treatment standards as specified in 268.41 ?		Yes _	N o
	c.	Provide the frequency of analyses conducted on treatment residues below:			
	D	Do mounting records adometally degreet would of that			
	υ.	Do operating records adequately document results of wasternallyses performed in accordance with 268.41?		Yes <u>·</u>	No
8.		s supernatant been determined to exceed treatment andards?		Yes _	N o
	Α.	If yes, is annual throughput greater than surface impoundment volume?		Yes _	No
9.	bee	residues were removed annually, have adequate precautions on taken to protect liners and do records indicate that spections of liner integrity are performed?		Yes_	N o
10.		nen removed, were solvent wastes managed subsequently n another surface impoundment ?		Yes_	N o
11.	W	nen removed, were wastes treated prior to disposal ?		Yes _	No
	A.	If yes, are waste residues treated onsite or offsite?			
	В.	Describe management method below:			

Page 4 Revision: 1/1989

Facility Name: Stelcote
EPA Id Number: Mobook 275034

Form B - Treatment, Storage and Disposal (cont'd)

Se	cti	on IV. RCRA-regulated Treatment (not including surface i	mpoundments	5
1.		d the facility operate treatment facilities for stricted wastes ?	Yes _	N o
	Ιf	no, skip the rest of Section IV.		
2.	De	scribe processes for each restricted waste treated onsit	e: 	
3.	Do	es the facility treat soft hammer wastes ?	Yes	N o
	Ιf	yes,		
	A.	Is treatment occurring as described in the facility's certification/demonstration?	Yes _	N o
	В.	Did the treatment facility certify all soft hammer waste as per the facility's demonstration and maintain copies of all certifications?	Yes _	N o
	c.	Did the facility send a copy of the demonstration and certification to the receiving treatment, recovery, or storage facility?	Yes	N o
4.		es the treatment facility test the treatment residuals accordance with an acceptible waste analysis plan?	Yes	No
5.	Do	treatment residuals exceed treatment standards?	Yes _	_ No
	If	yes,		
	A.	Describe processes used to handle those residuals ?		
	в.	Describe the frequency of testing of treatment residual below:	s	
6.	Was	s dilution used as a substitute for treatment ?	Yes	No

Page 5

Facility Name: 5telcote
EPA Id Number: Mobole 275036

Form B - Treatment, Storage and Disposal (cont'd)

7.	Are certifications and results of waste analyses kept in the operating record?	Yes	_ N o
	any treatment residuals were shipped offsite for further tresposal, complete Form C - Manifesting Restricted Wastes.	eatment or	•
Se	ction V. Land Disposal		
1.	Were restricted wastes placed in land disposal units (i.e. surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers) for other than treatment purposes?	Yes	_ N o
2.	Did the facility have appropriate notices or certifications from generators or treatment facilities in its operating record [268.7(a-b)]?	Yes	_ N o
3.	Did the facility obtain waste analyses of restricted wastes to determine if such wastes were in compliance with applicable treatment standards [268.7(c)]?	Yes	_ N o
4.	Were restricted wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units excluding national capacity variances?	Yes _	_ N o
	If yes,		
	A. Did the facility have an approved waiver based on "no migration" petition, approved case-by-case, capacity extension, or treatment standard variance?	Yes	_ N o
5.	Were restricted wastes, subject to national or case-by- case capacity variances or extensions, disposed?	Yes	_ N o
	If yes,		
	A. Were these wastes disposed of in a hazardous waste management unit that meets minimum technology requirements?	Yes	_ No
6.	Are adequate records of disposal maintained?	Yes	 No

Page 6

Facility Name: Steelcote
EPA Id Number: Mob 00 4 2750 36

Form B - Treatment, Storage and Disposal (cont'd)

7.	If wastes subject to nationwide variances, case-by-case extensions, or no migration petitions were disposed, does the facility have notices and records of disposal?	 Yes	. No
8.	If the facility has a case-by-case extension, is there data available to verify that the facility is making progress as described in progress reports?	 Yes	No
9.	If the facility is disposing of a soft hammer waste, are notices or certifications maintained onsite?	 Yes	No.
	If yes,		
	A. Could any of these wastes be classified as California List wastes ?	 Yes	No
	B. Did the facility seek to verify whether these wastes are subject to all restrictions?	 Yes	No.

Page 7 Revision: 1/1989 Inspector's Initials:

Facility Name:	Steeleote
EPA Id Number:	MOD006275036

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form C - Manifesting Restricted Wastes

Note: This form should be completed only if the generator or handler ships restricted waste offsite for treatment or disposal. The following requirements may also apply to treatment facilities (including incinerators) which ship residues, still bottoms, or ash offsite for additional treatment or disposal.

	for additional treatment or disposal.	
1.	If restricted wastes which <u>exceed</u> treatment standards, and are not subject to case-by-case extensions, "no migration" exemption, or nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:	
	A. Manifest document number ?	
	B. EPA waste identification code ?	<u>√</u> Yes No
	C. Treatment standards for each restricted waste?	YesNo
	D. Waste analysis data (if available) ?	✓ Yes No
	E. All applicable restrictions ?	
No	tice: Restricted wastes which exceed treatment standards may for treatment (including incineration). Such wastes a from land disposal, unless there is a variance or exte applicable to the waste.	re prohibited
2.	Identify all offsite treatment facilities accepting wastes exceeding treatment standards: Perer to Manifest Copies as ATTAC	AMENTS
3.	If restricted wastes <u>do not exceed</u> treatment standards, are subject to case-by-case extension, have a "no migration exemption, or a nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment: A. Manifest document number ?	Yes No ·

Page 1

Facility Name: Steelcote
EPA Id Number: Mob 004 275034

Form C - Manifesting Restricted Wastes (cont'd)

	B. EPA waste identification code ?	Yes No
	C. Treatment standards for each restricted waste?	Yes No
	D. Waste analysis data (if available) ?	Yes No
	E. All applicable restrictions ?	Yes No
	F. Date the wastes are subject to restrictions ?	Yes No
	G. The following certification?	Yes No
V	I certify under penalty of law that I personally have familiar with the waste through analysis and testing of knowledge of the waste to support this certification to complies with the treatment standards specified in 40 Subpart D. I believe that the information I submitted accurate and complete. I am aware that there are signifor submitting a false certification, including the poimprisonment.	or through that the waste CFR Part 268 is true, ficant penalties
No	tice: The above certification statement must be signed by representative of the facility.	an authorized
4.	Identify all offsite treatment or disposal facilities accepting wastes below treatment standards:	
5.	If waste is subject to a nationwide variance (e.g. solvent-water mixtures less than 1%), extension or petition has the facility provided notice to disposers that waste is exempt from land disposal restrictions?	Yes \ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
6.	Does the generator or handler keep records of all notifications or certifications for waste sent to offsite facilities <u>after</u> August 16, 1988 ?	Yes No

Page 2 Revision: 1/1989 Inspector's Initials: <u>full</u>

Facility Name: Steeleote
EPA Id Number: Mosioc 275036

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form D - Testing and Management of F-solvents and Dioxins

No	te:		form should be ones F—solvents or						
1.	tr	eatabi	facility correct lity group [268.4 ed onsite (see Ap	41] for F-so	lvents generat			/ s	No
2.			facility determin reatment standard			es			
	A.	Knowle	edge of process	?			<u></u> ¥ Ye	es <u>#</u>	No
	В.	Toxic:	facility employs equacies or inade of recover of recover of the state	equacies in any chemical from the following	their methods land of cated. Laborated tables and tables are process (TCLP)	below: ts use and	3/2/	naly	alysin alysin
		c.	Indicate any pro	oblems with	testing proced	ure belo	w:		····
		ii. A	tach test result	ts to report	•				
			Vere wastes teste Vastestreams char	_	P when processe	es or	Ye	*	No
			s testing done polidification ?	prior to dil	ution or		Ye	×s	No
	c.	Other	(specify):					·	
3.			vent wastes exce upon generation		-	ment		es	No

Page 1

	Facility Name: Steleote EPA Id Number: Mobooc275036
	EPA Id Number: Moboo6275036
	Form D - Testing and Management of F-solvents and Dioxins (cont'd)
4.	Did the facility dilute the waste or treatment residuals as a substitute for adequate treatment [268.3]? Were treatment residuals generated from 264/265 RCRA-exempt units or processes? YesNo
5.	Were treatment residuals generated from 264/265 RCRA-exempt units or processes ? YesNo
	If yes,
	A. List the type(s) of treatment and unit(s) below:
	Note: If the residuals from a RCRA-exempt treatment unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste identification requirements, have been met for the treatment residuals.
6.	Have F-solvents or dioxin wastes been stored for greater than 90 days ? Yes No
	If yes,
	A. Is facility operating under interim status or final permit? Yes No
If St	the answer was yes for either 6 or 6A, complete Form B - Treatment, prage and Disposal.
	At this time in the inspection, forther
	The subject of TREATMENT, STORAGE, &
	Disposar (TSD) is unresolve and will meed further clasification. Will call facility to EPA to corrange
	a meeting on this issue.

Page 2 Revision: 1/1989

Inspector's Initials:

Facility Name: Steelcote
EPA Id Number: MODO64275034

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form E - Testing and Management of California List Wastes

No	ľ	this form should be completed only if the facility general andles California List wastes at the concentrations last restricted Waste Determination.	
1.	wast	the facility conducted any testing of restricted tes to determine whether the concentrations qualify a as California Wastes ?	Yes No
	If r	ю,	
	wast	the facility retained records documenting that the se is not restricted under the California List by eledge of process ?	Yes No
2.	as d List	the Paint Filter Liquids Test (PFLT) been performed lescribed by SW-846 to determine whether California wastes (except halogenated organic compounds) are iquid form ?	Yes No
3.		rastes have been determined to be in liquid form, these wastes solidified using an absorbent?	Yes No
	A. 1	f yes, note type of absorbent used:	
	в. 1	indicate which wastes were solidified by aborbent belo	w:
	Chec	k each box that applies:	
		Liquid hazardous wastes or liquids associated with s containing free cyanides at concentration greater th	
		Liquid hazardous wastes or liquids associated with s containing one or more of the following concentration	
		Arsenic or compounds containing arsenic greater	than 500 mg/L;
		Cadmium or compounds containing cadmium greater	than 100 mg/L;
		Chromium or compounds containing chromium great	er than 500 mg/L;
		I lead or compounds containing lead greater than	500 mg/L:

Page 1

Facility Name: Steleote
EPA Id Number: M10006 275036 Form E - Testing and Management of California List Wastes (cont'd) Mercury or compounds containing mercury greater than 20 mg/L; Nickel or compounds containing nickel greater than 134 mg/L; Selenium or compounds containing selenium greater than 100 mg/L; or Thallium or compounds containing Thallium greater than 130 mg/L. Liquid hazardous wastes exhibiting a pH less than or equal to 2.0. Liquid hazardous wastes that also contain polychlorinated biphenols (PCBs) at concentrations between 50 to 500 mg/L. Liquid or nonliquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/Kg. 4. Has the facility determined whether concentration levels of the analytes (not extracts or filtrates) equal or exceed prohibition levels or whether the pH of the wastes is less than or equal to 2.0 based on: A. Knowledge of process ? Yes No i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

B. Testing?

___ Yes ___ No

i. Did the facility determine if concentration levels in PFLT extracts exceed cyanide or metal treatment standards?

Yes No

ii. List the test methods used:

iii. List constituents and respective concentration levels for wastes found to exceed prohibition

levels below:

Page 2

Facility Name: 5tee/cote
EPA Id Number: Mod 106 275034

Form E - Testing and Management of California List Wastes (cont'd)

- 5. Has the facility treated waste onsite or offsite:
 - A. If onsite, complete Form B Treatment, Storage, and Disposal.
 - B. If offsite, complete Form C Manifesting Restricted Wastes.

Page 3

Revision: 1/1989

Inspector's Initials:

Facility Name: Steckete
EPA Id Number: Moboo6275036

LAND DISPOSAL RESTRICTION CHECKLIST FOR FY 1989

Form F - Testing and Management of "First Third" Wastes

Note:	This form should be completed only if the facility gene handles wastes restricted under the "First Third" list 1988).		,
I. Ha	rd Hammer Provisions		
tr	s the facility correctly determined the appropriate eatability group for hard hammer wastes generated handled onsite?	Yes	No
	s the facility determined whether hard hammer wastes ceed treatment standards based on the following:		
A.	Knowledge of process ?	Yes	_ N o
	i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:		
в.	Toxicity Characteristic Leaching Process (TCLP) ?	Yes _	_ No
	i. If yes, provide the following information:		
	a. Last test date:		
•	b. Frequency of testing:		
	c. Indicate any problems with testing procedure belo	₩:	
	ii. Attach test results to report.		
	iii. Were wastes tested using TCLP when processes or wastestreams changed ?	Yes _	_ N o
	<pre>iv. Was testing done prior to dilution or solidification ?</pre>	Yes	_ No

Page 1 Revision: 1/1989

Facility Name: Stellote
EPA Id Number: Modou 275031

Form F - Testing and Management of "First Third" Wastes

	C. Other (specify):		
3.	Did the hard hammer wastes exceed their applicable treatment standards upon generation [268.7(a)(2)]?	Yes	_ No
4.	Is there any reason to believe that the facility may have diluted these wastes to change the applicable treatment standard (based on review if process operation, pipe routing, point of sampling, etc.) ?	Yes	_ N o
5.	Did the facility ascertain whether hard hammer wastes were appropriately assigned wastewater on non-wastewater designations (nonwastewaters are > 1% TOC and > 1% suspended solids) ?	Yes	_ No
6.	Does the facility handle KO61 wastes ?	Yes	_ No
	If yes,		
	A. Were nonwastewaters appropriately classified in either the high or low zinc subcategories (> 15% Zn) ?	Yes	_ No
7.	Does the facility handle K101 or K102 wastes ?	Yes	_ 1%
	If yes,		
	A. Were nonwastewaters appropriately classified in either the high or low arsenic subcategories ?	Yes	_ No
8.	Have hard hammer wastes been stored for greater than 90 days ?	Yes	_ No
	If yes,		
	A. is facility operating under interim status or final permit ?	Yes	_ N o
Ιf	the answer was yes for either 8 or 8A, complete Form B - 1	Preatment,	

If the answer was yes for either 8 or 8A, complete Form B - Treatment, Storage and Disposal.

Page 2

Facility Name: Studente
EPA Id Number: MOD 006 275036

Form F - Testing and Management of "First Third" Wastes

II. Soft Hammer Provisions 1. Has the facility submitted demonstrations and certifications for each soft hammer waste destined for disposal in landfills or surface impoundments to the Regional Administrator prior to the shipment of the waste to the disposal facility? _Yes __No If yes, i. Has the facility retained a copy of each demonstration onsite? Yes No ii. Has the facility retained copies of all certifications sent to the disposal facility? ___Yes __No 2. Has the facility sent copies and kept copies of the following information with each shipment of soft hammer wastes: ____ Yes ___ No A. Manifest document number ? ___ Yes ___ No B. EPA waste identification code ? C. All applicable restrictions ? ___ Yes __ No ___ Yes ___ No D. Waste analysis data (if available) ? E. Applicable certifications? ___ Yes ___ No 3. Do facility records indicate that soft hammer wastes are destined for disposal in landfills or surface ___ Yes __ No impoundments? If yes, A. List the name of the waste(s) destined for disposal: B. Name the facility where the waste is destined:

Page 3

Facility Name: Steelcote
EPA Id Number: Moboo6275036

Form F - Testing and Management of "First Third" Wastes

4.	Have	soft	hammer	wastes	been	stored	for	greater			
			ays ?						Yes _	1	No

A. If yes, is facility operating under interim status or final permit?

Yes ___ No

If the answer was yes for either 4 or 4A, complete Form ${\tt B}$ - Treatment, Storage and Disposal.

Page 4
Revision: 1/1989

Inspector's Initials: ____

ATTACHMENT 4 NOTICE OF VIOLATION, CONFIDENTIAL BUSINESS INFORMATION FORM AND RECEIPT FOR DOCUMENTS

7-EPA-3500.7 (Rev. 5/85)

Signature:

Title:

U.S. ENVIRONMENTAL PROTECTION AGENCY RCRA INSPECTION CONFIDENTIALITY NOTICE

Name and Address of Inspector(s) Greg C. Uetrecht Laurie M. Smith	Name and Address of Facility Steelcote Manufacturing
	Owner, Operator, or Agent in Charge Tarnes Moore
	Title Plant Manager
	Address 3418 Gratiot St. St. Louis, Mo 63103
Name of Individual to Whom Notice Given James Moore	Plant Manager 06/09/89

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FDIA), 5 U.S.C. 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act, Section 3007, as amended. EPA is required to make inspection data available in response to FOIA requests, unless the Administrator of the Agency determines that the data contains information entitled to confidential treatment.

Any or all of the information collected by EPA during the inspection may be claimed confidential, if it relates to trade secrets or commercial of financial matters that you consider to be confidential. If you make claims of confidentiality, EPA will disclose the information only to the extent, and by the means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential information. Among other things, the regulations require that the EPA notify you in advance of publicly disclosing any information you have claimed and certified confidential.

To claim information confidential, you must certify that each claimed item meets all of the following criteria:

- 1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
- 2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding).
- 3. The information is not publicly available elsewhere.
- 4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time you may make claims that some or all of the information is confidential and meets the four criteria listed above.

	\$				
RCRA INSPECTI	ON CONFIDENTIALI	TY NOTICE	, -		
			Stule	ote Mfg.	C.
f vou are not	authorized by yo	ur company	to make conf	identiality c	laims
his notice wil	l be sent by cer	tified mail	, along with	the receipt t	for doc-
	, and other mate firm, within two				

This statement from the Owner, Operator, or Agent in Charge should be addressed to:

a statement, specifying any information which should receive confidential

treatment.

Mr. David A. Wagoner Director, Waste Management Division United States Environmental Protection Agency 726 Minnesota Avenue Kansas City, Kansas 66101

and mailed by registered, return-receipt requested mail with in seven (7) calendar days of receipt of this Notice.

Failure by your firm to submit a written request that information be treated as confidential, either at the completion of the inspection or by the Owner, Operator, or Agent in charge, within the seven-day period, will be treated by the EPA as a waiver by your company of any claims for confidentiality regarding the inspection data.

To be completed by the facility official receiving this Notice:

I have received and read this Notice.

Name JAMES S. MOORE

Title PLANT MANAGER

Signature fames S. Moore

Date Ufg/ag

If there is no one on the premises of the facility who is authori

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the Owner, Operator, or Agent in charge of the company. If there is another company official who should also receive this information, please designate below:

Name			
Title			
Address	- 1	 	

U.S. ENVIRONMENTAL PROTECTION AGENCY 726 MINNESOTA AVENUE KANSAS CITY, KANSAS 66101

REQUEST FOR CONFIDENTIAL TREATMENT

Name of Individual	Title Date
James G. Moore	Plant Manager 06/09/89
Firm Name	Firm Address
Stulcote Manufacturing Co.	Firm Address, 3418 Gratiot St. St. Louis, MO 63103

Information for which Confidential Treatment is requested:

Acknowledgement of Claimant

The undersigned requests that confidential treatment of the information described be provided in accordance with provisions of the Freedom of Information Act (FOIA), 5U.S.C.552; EPA regulations issued thereunder, 40 CFR Part 2; and the Resource Conservation and Recovery Act (RCRA), Section 3007, as amended. The undersigned further acknowledges that he/she is authorized to make such claims for his/her firm.

The undersigned also certifies that each item described above meets all of the following criteria: (1) The company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures: (2) The information is not, and has not been, reasonably attainable without the company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial of quasi-judicial proceeding; (3) The information is not publicly available elsewhere; and (4) Disclosure of the information would cause substantial harm to the company's competitive position.

Signature (Owner, Ope	erator, or Agent)	Title
Name of Inspector	le	PLANT MANAGER
Name of Inspector	Title	Inspector's Signature
Laurie M. Smith	Industrial Hygienist	Laucie M. Smith

U.S. ENVIRONMENTAL PROTECTION AGENCY

RECEIPT FOR SAMPLES AND DOCUMENTS

Inspector(s) Name and Address Jacobs Engineering Group, Inc. TES IV Contractors to the U. S. EPA 10901 W. 84th TERRACE, SUITE 210 Lenexa, KS 66214 Firm Name and Address Steleote Manufacturing Contractors of the U. S. EPA Name of Individual Tames S. Moore
Iogol W. 84th TERRACE, Suite 210 Lenexa, KS 66214 Name of Individual
Lenexa, KS 66214
James S. Moore
Title Plant Manager
. Date Collected Samples were: N/A N/A
() Purchased () Received no charge ()Borrowed
Sample Numbers Amount paid for Samples
Duplicate Samples Requested Method of Payment N/A N/A
() Yes () No () Cash () Youcher () To be Billed
of the Resource Conservation and Recovery Act.
Receipt for the document(s) and/or Sample(s) described below is hereby
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Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged: 18 photographs 1 wash analysia duted 08/16/88 8 Material Safety Nata Sheets
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Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged: 18 photographs 1 wash analysis duted 08/16/88 8 Material Sapety Mata Sheets 2 MANK Hayardows Waste Manifests 1 Coc. Nos.: 011570017 0019 1 ARKAASAS Manifest Nos.: AR - 280229
Receipt for the document(s) and/or Sample(s) described below is hereby acknowledged: 18 photographs 1 wash analysis duted 08/16/88 8 Material Sapety Mata Sheets 2 MDNR Hagardons Waste Manifests 1 lloc. Nos.: 011570017 0019 1 ARKANSAS Manifest Nos.: AR - 280229
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